

Sales, James

From: ross hartman <rhartman@strategic-es.com>
Sent: Monday, August 22, 2016 6:37 AM
To: Sales, James
Subject: RE: Hello. Could you send a report on the removal of the substrate at Pollock elementary?

Hello Mr. Sales,

Yes we will have the report to you later this week or beginning of next (at the latest).

Thanks

From: Sales, James [mailto:sales.james@epa.gov]
Sent: Friday, August 19, 2016 10:47 AM
To: ross hartman <rhartman@strategic-es.com>
Subject: Hello. Could you send a report on the removal of the substrate at Pollock elementary?

Sales, James

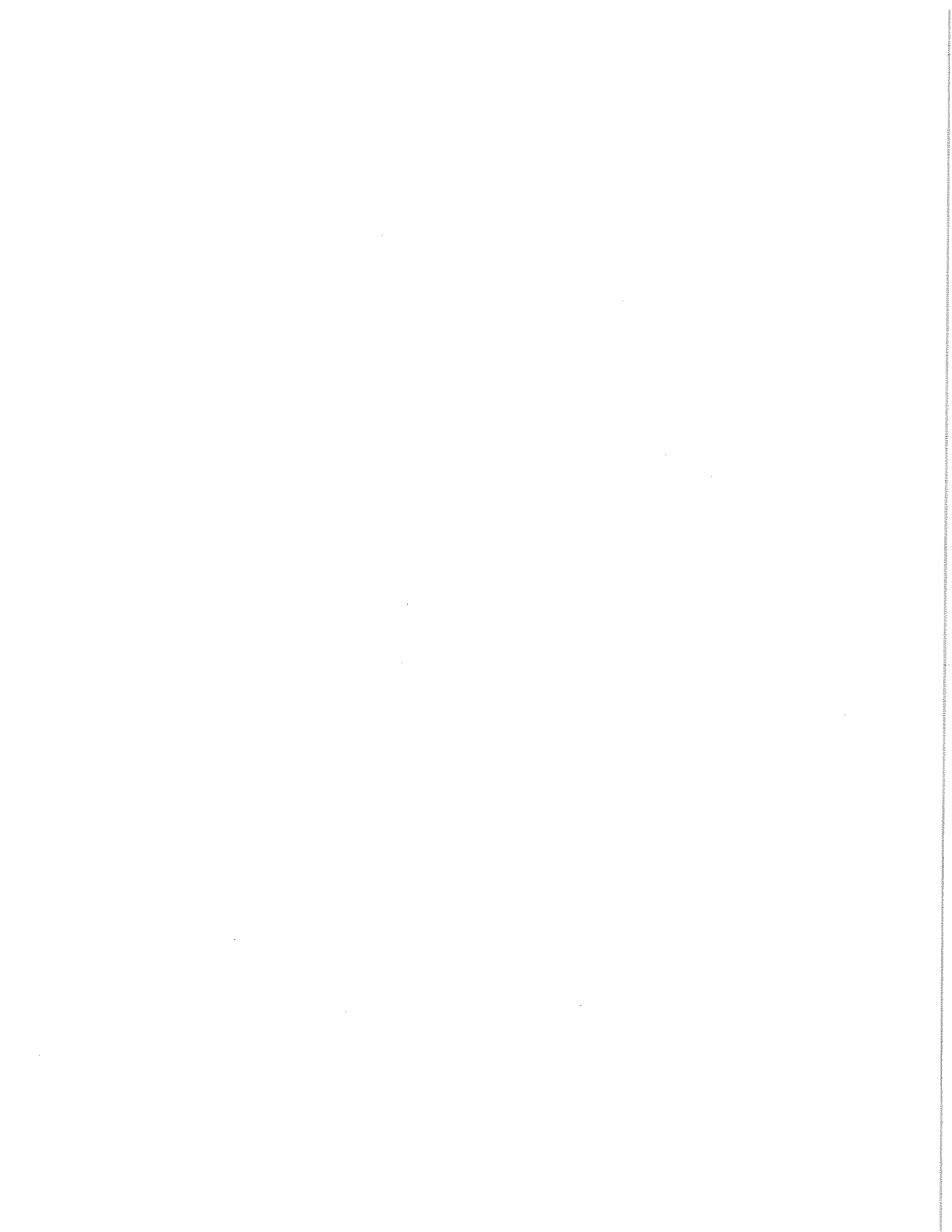
From: Mitchell McCrea <mmccrea@baronbudd.com>
Sent: Monday, July 11, 2016 11:00 AM
To: Sales, James
Cc: Ross Hartman (rhartman@strategic-es.com); kbrown@eheinc.com
Subject: RE: Hello. Any update on Pollock Elementary?

Categories: Red Category

Jim,

Ross Hartman of Strategic Environmental Services can update you on the final remediation/removal work that his team accomplished over the Easter break this year.

From: Sales, James [mailto:sales.james@epa.gov]
Sent: Friday, July 08, 2016 3:23 PM
To: Mitchell McCrea
Subject: Hello. Any update on Pollock Elementary?



Sales, James

From: Mitchell McCrea <mmccrea@baronbudd.com>
Sent: Thursday, May 07, 2015 3:16 PM
To: Sales, James
Cc: Christina Cossich; Elena Rojo
Subject: Pollock Elementary School, Pollock, Louisiana
Attachments: Initial Letter to EPA Region 6.pdf

Jim,

Please see the attached. We ask that you keep all communications regarding this matter through us as the schools attorneys. We will wait to hear from you. Thank you.

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
3102 OAK LAWN AVENUE | SUITE 1100 | DALLAS, TEXAS 75219
T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
mmccrea@baronbudd.com | www.baronbudd.com

Sales, James

From: Sales, James
Sent: Thursday, May 07, 2015 3:56 PM
To: Mitchell McCrea
Subject: RE: Pollock Elementary School, Pollock, Louisiana

Hello- Thank you for the request. Please send a hard copy through the mail as well. Also, caulk is a bulk product waste which is regulated under 40 CFR 761.62, so you would actually be requesting a risk-based approval under 761.62 c rather than 761.61 c. I will review the information and get back to you soon.

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Thursday, May 07, 2015 3:16 PM
To: Sales, James
Cc: Christina Cossich; Elena Rojo
Subject: Pollock Elementary School, Pollock, Louisiana

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Sales, James

From: Sales, James
Sent: Tuesday, May 12, 2015 12:57 PM
To: Mitchell McCrea
Subject: RE: Pollock Elementary School, Pollock, Louisiana

Hello. I did a quick review of your application.

The basic proposal sounds ok to me. I want to get a better understanding of the sampling areas and whether it is representative of the old portion of the school

Also,

1. Was a light ballast inventory conducted to determine if there are any leaking PCB light ballasts at the school?
2. Will t the school have a portion of its website dedicated to keeping parents and public informed of progress on the PCB remediation?
3. What is the schedule for completion of remediation after interim remediation is complete?
4. Region 1 has required air monitoring during the interim period before final remediation. Is there a reason for not proposing that in this application?

Those are my initial thoughts. We can discuss further soon.

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Sales, James

From: Sales, James
Sent: Tuesday, May 12, 2015 4:18 PM
To: Spalding, Susan; Jones, Bruce; Fruitwala, Kishor
Subject: FW: Pollock Elementary School, Pollock, Louisiana
Attachments: Initial Letter to EPA Region 6.pdf

FYI

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
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To: Sales, James
Cc: Christina Cossich; Elena Rojo
Subject: Pollock Elementary School, Pollock, Louisiana

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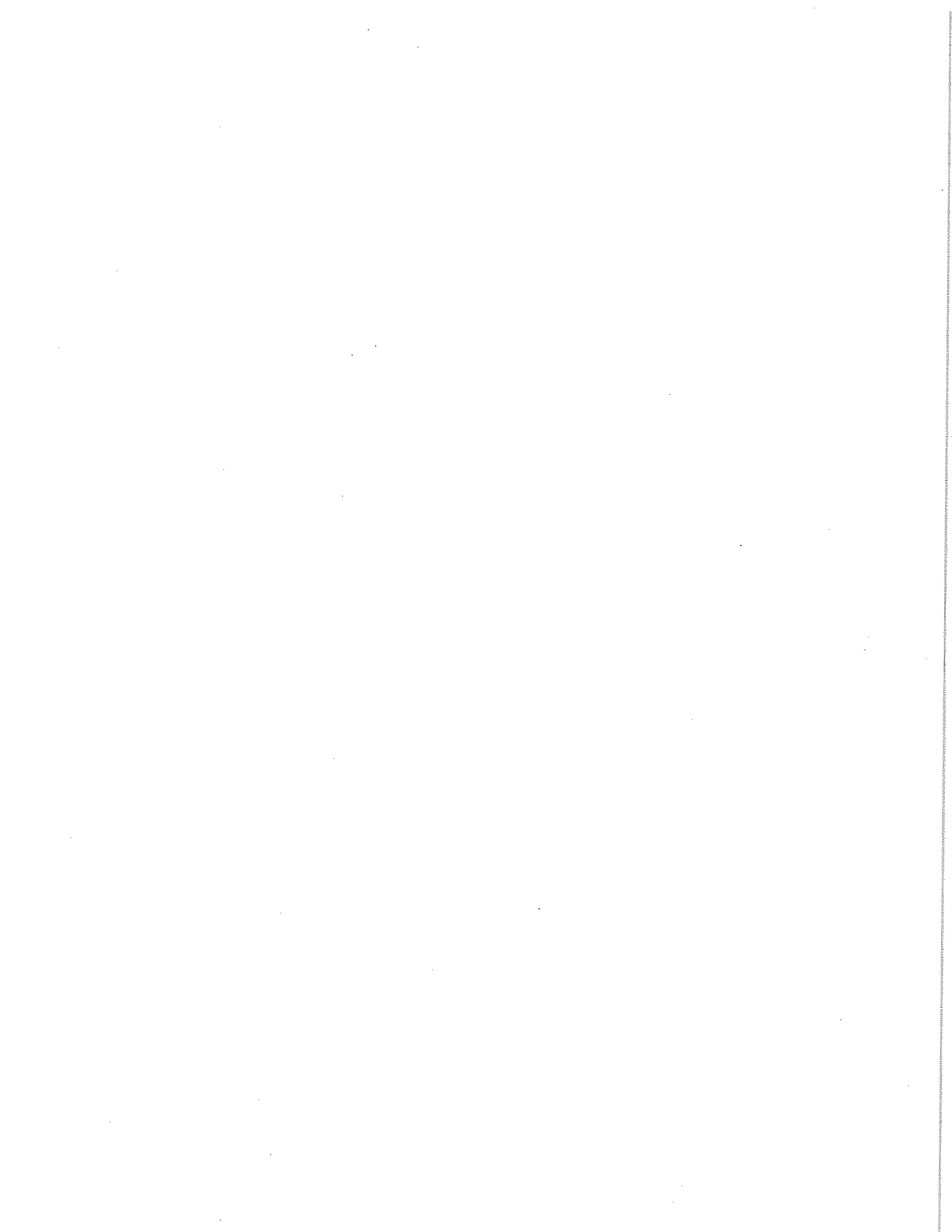
WAR ITEM

Subject: PCB Risk-based Interim Measure Disposal Application from Pollock Elementary School (PES), Pollock, Louisiana, for Encapsulating the PCB Contaminated Caulk Around Windows.

Summary: PES submitted a risk-based interim measure PCB approval request dated May 7, 2015. In the application, the contractor reported that interior and exterior caulk around windows had been characterized, and surface wipe and air samples had been collected in various locations in the School. PCB concentrations in caulk samples ranged from below detection to 78,800 ppm. PCBs were not detected in any of the wipe samples, and the highest air concentrations were at 240 nanograms per cubic meter which is below EPA's health risk limit of 300 nanograms per cubic meter for occupied buildings.

PES has proposed an interim measure plan to encapsulate the caulk by applying a polypropylene tape over the exposed caulk surfaces (the tape does not absorb PCBs), then collect confirmatory wipe samples to ensure no PCBs are on the surface of the tape, and then coat the tape with a non-PCB silicon caulk.

PES intends to formulate a final remediation plan and submit it to EPA Region 6. The interim measure plan is currently under review for completeness.



Sales, James

From: Mitchell McCrea <mmccrea@baronbudd.com>
Sent: Tuesday, May 12, 2015 5:20 PM
To: Sales, James
Subject: RE: Pollock Elementary School, Pollock, Louisiana

Mr. Sales,

Thank you for your email. Please see my responses below.

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
3102 OAK LAWN AVENUE | SUITE 1100 | DALLAS, TEXAS 75219
T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
mmccrea@baronbudd.com | www.baronbudd.com

From: Sales, James [mailto:sales.james@epa.gov]
Sent: Tuesday, May 12, 2015 12:57 PM
To: Mitchell McCrea
Subject: RE: Pollock Elementary School, Pollock, Louisiana

Hello. I did a quick review of your application.

The basic proposal sounds ok to me. I want to get a better understanding of the sampling areas and whether it is representative of the old portion of the school

Also,

1. Was a light ballast inventory conducted to determine if there are any leaking PCB light ballasts at the school? YES, BUT ALL LIGHT BALLASTS HAD BEEN CHANGED OUT SEVERAL YEARS PREVIOUSLY.
2. Will t the school have a portion of its website dedicated to keeping parents and public informed of progress on the PCB remediation? IF THIS IS REQUIRED, WE WILL DO SO. THE PARENTS, TEACHERS, AND STAFF HAVE ALREADY BEEN NOTIFIED BY LETTER, AND THE SCHOOL DISTRICT WAS PLANNING TO FOLLOW UP WITH WRITTEN CORRESPONDENCE, SINCE IT IS UNCERTAIN HOW MANY FOLKS HAVE ACCESS TO THE INTERNET OR USE THE INTERNET. BUT PLEASE LET US KNOW WHAT YOU WANT/REQUIRE.
3. What is the schedule for completion of remediation after interim remediation is complete? CHECKING WITH OUR EXPERTS, AND I WILL GET BACK TO YOU.
4. Region 1 has required air monitoring during the interim period before final remediation. Is there a reason for not proposing that in this application? CHECKING WITH OUR EXPERTS, AND I WILL GET BACK TO YOU.

Those are my initial thoughts. We can discuss further soon. SOUNDS GOOD. THANK YOU.

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Thursday, May 07, 2015 3:16 PM
To: Sales, James

Cc: Christina Cossich; Elena Rojo
Subject: Pollock Elementary School, Pollock, Louisiana

Jim,

Please see the attached. We ask that you keep all communications regarding this matter through us as the schools attorneys. We will wait to hear from you. Thank you.

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mmccrea@baronbudd.com | www.baronbudd.com

Sales, James

From: Fruitwala, Kishor
Sent: Wednesday, May 13, 2015 9:38 AM
To: Spalding, Susan; Jones, Bruce
Cc: Sales, James
Subject: PCBs in school - draft WAR item

For your review:

PCB-contaminated Caulk found at Pollock Elementary School (PES), Pollock, Louisiana: PES submitted an application dated May 7 for approval of a risk-based interim remedial measure for PCBs found in windows caulk. This is a first such reported case in R6. PCBs concentrations in caulk samples ranged from below detection to 78,800 ppm. PCBs were not detected in any of the wipe samples, and the highest air concentrations were at 240 nanogram per cubic meter which is below EPA's health risk limit of 300 nanogram per cubic meter for occupied buildings. PES has proposed an interim measure plan to encapsulate the caulk by applying a polypropylene tape over the exposed caulk surfaces (the tape does not absorb PCBs), then collect confirmatory wipe samples to verify that no PCBs are on the surface of the tape, and then coat the tape with a non-PCB silicon caulk. PES intends to formulate a final remediation plan and submit it to EPA Region 6. The interim measure plan is currently under review. **(Contact: Jim Sales, x 6796)**

Sales, James

From: Sales, James
Sent: Wednesday, May 13, 2015 9:40 AM
To: Fruitwala, Kishor
Subject: RE: PCBs in school - draft WAR item

Yes- that's good—thanks!

From: Fruitwala, Kishor
Sent: Wednesday, May 13, 2015 9:38 AM
To: Spalding, Susan; Jones, Bruce
Cc: Sales, James
Subject: PCBs in school - draft WAR item

For your review:

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Sales, James

From: Sales, James
Sent: Friday, May 15, 2015 10:36 AM
To: Spalding, Susan
Subject: RE: Pollock Elementary

Hi. Yes I'll be looking at all of the issues as I work with them. They re-lamped the school 7 years ago, so no problem there. They are willing to do the website. They are consulting internally about their plans for final remediation and any ongoing air sampling during the interim period. After I get that information from them then I will have a call with them to discuss the overall project. I'll be comparing that with Kim Tisa in R1 as I go.

From: Spalding, Susan
Sent: Friday, May 15, 2015 10:32 AM
To: Fruitwala, Kishor; Sales, James
Subject: Pollock Elementary

Jim - I think you are already doing this, but let's just be sure we are consistent with the other Regions on the amount of sampling that is necessary. I'm sure the school district would rather use their scarce resources for encapsulation rather than more sampling.

Sales, James

From: Spalding, Susan
Sent: Friday, May 15, 2015 10:37 AM
To: Sales, James
Subject: Re: Pollock Elementary

That is great Jim, thanks. Glad they already re-lamped. Must be really difficult keeping up with these old buildings.

From: Sales, James
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Sales, James

From: Sales, James
Sent: Monday, May 18, 2015 9:07 AM
To: Mitchell McCrea
Subject: RE: Pollock Elementary School, Pollock, Louisiana

Hello—Thanks for the info—Could we have a brief call sometime today to discuss where we are on this? I'm free after 2:00 pm.

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Monday, May 18, 2015 8:59 AM
To: Sales, James
Cc: Christina Cossich
Subject: Pollock Elementary School, Pollock, Louisiana

Jim,

Good morning. Hope you had a good weekend. Please see below for our responses to your questions. Let us know if you have any other questions or concerns. Thank you for your help on this.

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
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Sent: Tuesday, May 12, 2015 12:57 PM
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Also,

1. Was a light ballast inventory conducted to determine if there are any leaking PCB light ballasts at the school?

During our initial walk-through of the school in June 2014, we visually inspected light ballasts and also visited with the school district's maintenance manager, school facilities staff, and an on-site electrician who confirmed that all of the light ballasts had been replaced with non-PCB light ballasts some time previously as part of an energy conservation program. We observed that certain ballasts being replaced while we were there did not contain PCBs, because both the old and new ballasts showed "no pcbs" on their labels. In one location, we noticed brown residue around one of the light ballasts, but wipe samples that were tested of the brown residue came back negative for PCBs.

2. Will t the school have a portion of its website dedicated to keeping parents and public informed of progress on the PCB remediation?

The school's preferred method of communication with its parents is by written correspondence. The school district has already sent a letter to the school community notifying it of the PCB testing that was done and the plan ahead. Once mitigation measures have been completed, we will recommend to the school district that another letter go out to the school community informing it of what has been done to mitigate the PCB contamination at Pollock Elementary.

3. What is the schedule for completion of remediation after interim remediation is complete?

We aim to begin the interim mitigation measures during the summer of 2015. However, no schedule has been firmly established at this time, because our discussions with the school district continue about planning, getting approvals for, budgeting for, and bidding out (through the required public bidding process) the mitigation and remediation measures. The school district also needs to make sure it can continue to function as a school during the interim remediation and final remediation periods. For the time being, we are only seeking EPA's approval of the interim mitigation measures. Once the interim mitigation plans have been approved and completed, we will then submit to you a detailed monitoring and maintenance implementation plan (MMIP) to assess continued performance of the mitigation measures.

4. Region 1 has required air monitoring during the interim period before final remediation. Is there a reason for not proposing that in this application?

We have requested risk-based approval to implement mitigation measures at the school until a more permanent solution is developed. Following our discovery of PCB-containing caulk, we tested the air in Pollock Elementary during the summer of 2014 (when PCB emission from caulk is expected to be the highest), and the testing showed that PCB levels in the air were below the EPA guidelines for elementary schools. We will submit an MMIP that will address this issue once the interim remediation plans have been approved and implemented. The MMIP will include inspection and surveillance activities along with periodic, confirmatory wipe sampling of the encapsulated surfaces and air monitoring. The rationale for submitting the MMIP after completion of the mitigation measures is that the actual inspection and surveillance requirements will be guided by the specific field conditions encountered during the mitigation work. The interim mitigation recommended at this time includes encapsulation of PCB-containing caulk.

Those are my initial thoughts. We can discuss further soon.

From: Mitchell McCrea [<mailto:mmccrea@baronbudd.com>]

Sent: Thursday, May 07, 2015 3:16 PM

To: Sales, James

Cc: Christina Cossich; Elena Rojo

Subject: Pollock Elementary School, Pollock, Louisiana

Jim,

Please see the attached. We ask that you keep all communications regarding this matter through us as the schools attorneys. We will wait to hear from you. Thank you.

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Sales, James

From: Sales, James
Sent: Monday, May 18, 2015 9:18 AM
To: Mitchell McCrea
Subject: RE: Pollock Elementary School, Pollock, Louisiana

Ok good—I'll call you at 3 today.

From: Mitchell McCrea [<mailto:mmccrea@baronbudd.com>]
Sent: Monday, May 18, 2015 9:13 AM
To: Sales, James
Subject: RE: Pollock Elementary School, Pollock, Louisiana

Yes. I can talk at 3 pm. My direct dial is 214-523-6420.

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Sent: Thursday, May 07, 2015 3:16 PM

To: Sales, James

Cc: Christina Cossich; Elena Rojo

Subject: Pollock Elementary School, Pollock, Louisiana

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mmccrea@baronbudd.com | www.baronbudd.com

Sales, James

From: Sales, James
Sent: Monday, May 18, 2015 12:31 PM
To: Jones, Bruce
Subject: I want to talk to my technical contact for the Pollock School PCB project-- he happens to be with the law firm also-- You have any problems with me talking with him?

James Sales
EPA Region 6 PCB Coordinator
1445 Ross Ave.
Dallas, TX 75202
(214) 665-6796

Sales, James

From: Jones, Bruce
Sent: Monday, May 18, 2015 2:04 PM
To: mmccrea@baronbudd.com
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: PCBs in Pollock Elementary School

Dear Mr McCrea, EPA will need appropriate documentation from the School District that your law firm and the remedial contractor are employed by the School District and that you both are authorized to act on their behalf and that they wish that all correspondence be sent to you directly at your law firm.

Bruce Jones
US EPA Region 6
Office of Regional Counsel
1445 Ross Ave
Dallas, TX 75202
214 665-3184

Sales, James

From: Mitchell McCrea <mmccrea@baronbudd.com>
Sent: Monday, May 18, 2015 2:25 PM
To: Jones, Bruced
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: RE: PCBs in Pollock Elementary School

Ok. I will get something from them.

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
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mmccrea@baronbudd.com | www.baronbudd.com

From: Jones, Bruced [<mailto:Jones.Bruced@epa.gov>]
Sent: Monday, May 18, 2015 2:23 PM
To: Mitchell McCrea
Subject: RE: PCBs in Pollock Elementary School

No, since it involves a public entity, we need something from them directing us to you.

Bruce Jones
US EPA Region 6
1445 Ross Ave
Dallas, TX 75202
214 665-3184

From: Mitchell McCrea [<mailto:mmccrea@baronbudd.com>]
Sent: Monday, May 18, 2015 2:07 PM
To: Jones, Bruced
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: RE: PCBs in Pollock Elementary School

Will a letter of representation from us suffice?

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
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T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
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From: Jones, Bruced [<mailto:Jones.Bruced@epa.gov>]
Sent: Monday, May 18, 2015 2:04 PM
To: Mitchell McCrea
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: PCBs in Pollock Elementary School

Dear Mr McCrea, EPA will need appropriate documentation from the School District that your law firm and the remedial contractor are employed by the School District and that you both are authorized to act on their behalf and that they wish that all correspondence be sent to you directly at your law firm.

Bruce Jones
US EPA Region 6
Office of Regional Counsel
1445 Ross Ave
Dallas, TX 75202
214 665-3184

Sales, James

From: Jones, Bruced
Sent: Monday, May 18, 2015 3:15 PM
To: Sales, James
Subject: RE: I want to talk to my technical contact for the Pollock School PCB project-- he happens to be with the law firm also-- You have any problems with me talking with him?

Is he a lawyer? Is he the law firm's in house expert? This firm is known for being a toxic tort litigator, so they may have more of an agenda than just remediating the site. You can talk to him, just be aware.

Bruce Jones
US EPA Region 6
1445 Ross Ave
Dallas, TX 75202
214 665-3184

From: Sales, James
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To: Jones, Bruced
Subject: I want to talk to my technical contact for the Pollock School PCB project-- he happens to be with the law firm also-- You have any problems with me talking with him?

James Sales
EPA Region 6 PCB Coordinator
1445 Ross Ave.
Dallas, TX 75202
(214) 665-6796

Sales, James

From: Sales, James
Sent: Monday, May 18, 2015 3:44 PM
To: Jones, Bruced
Subject: RE: I want to talk to my technical contact for the Pollock School PCB project-- he happens to be with the law firm also-- You have any problems with me talking with him?

Call me when you have a chance

From: Jones, Bruced
Sent: Monday, May 18, 2015 3:33 PM
To: Sales, James
Subject: RE: I want to talk to my technical contact for the Pollock School PCB project-- he happens to be with the law firm also-- You have any problems with me talking with him?

We should probably talk with your management this could raise some issues we should all be aware of.

Bruce Jones
US EPA Region 6
1445 Ross Ave
Dallas, TX 75202
214 665-3184

From: Sales, James
Sent: Monday, May 18, 2015 3:29 PM
To: Jones, Bruced
Subject: RE: I want to talk to my technical contact for the Pollock School PCB project-- he happens to be with the law firm also-- You have any problems with me talking with him?

They want to sue Monsanto for the PCBs in the caulk.

From: Jones, Bruced
Sent: Monday, May 18, 2015 3:15 PM
To: Sales, James
Subject: RE: I want to talk to my technical contact for the Pollock School PCB project-- he happens to be with the law firm also-- You have any problems with me talking with him?

Is he a lawyer? Is he the law firm's in house expert? This firm is known for being a toxic tort litigator, so they may have more of an agenda than just remediating the site. You can talk to him, just be aware.

Bruce Jones
US EPA Region 6
1445 Ross Ave
Dallas, TX 75202
214 665-3184

From: Sales, James

Sent: Monday, May 18, 2015 12:31 PM

To: Jones, Bruce

Subject: I want to talk to my technical contact for the Pollock School PCB project-- he happens to be with the law firm also-- You have any problems with me talking with him?

James Sales

EPA Region 6 PCB Coordinator

1445 Ross Ave.

Dallas, TX 75202

(214) 665-6796

Sales, James

From: Mitchell McCrea <mmccrea@baronbudd.com>
Sent: Monday, May 18, 2015 5:13 PM
To: Sales, James
Subject: PCB: Pollock Elem., LA

Jim,

Will 1:30 pm tomorrow work for you? If so, please use the following call-in information so EH&E can join us on the call.

Have a good evening.

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
3102 OAK LAWN AVENUE | SUITE 1100 | DALLAS, TEXAS 75219
T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
mmccrea@baronbudd.com | www.baronbudd.com

Sales, James

From: Sales, James
Sent: Tuesday, May 19, 2015 9:16 AM
To: Wills, Jennifer
Subject: FW: PCBs in Pollock Elementary School

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Monday, May 18, 2015 2:07 PM
To: Jones, Bruced
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: RE: PCBs in Pollock Elementary School

Will a letter of representation from us suffice?

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
3102 OAK LAWN AVENUE | SUITE 1100 | DALLAS, TEXAS 75219
T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
mmccrea@baronbudd.com | www.baronbudd.com

From: Jones, Bruced [mailto:Jones.Bruced@epa.gov]
Sent: Monday, May 18, 2015 2:04 PM
To: Mitchell McCrea
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: PCBs in Pollock Elementary School

Dear Mr McCrea, EPA will need appropriate documentation from the School District that your law firm and the remedial contractor are employed by the School District and that you both are authorized to act on their behalf and that they wish that all correspondence be sent to you directly at your law firm.

Bruce Jones
US EPA Region 6
Office of Regional Counsel
1445 Ross Ave
Dallas, TX 75202
214 665-3184

Sales, James

From: Mitchell McCrea <mmccrea@baronbudd.com>
Sent: Tuesday, May 19, 2015 12:34 PM
To: Sales, James
Subject: RE: Pollock Elem., LA

Hey, Jim. Left a VM earlier. Call my direct 214-523-6420 or my cell 214-498-7508. Or, I will talk to you in an hour, right?

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
3102 OAK LAWN AVENUE | SUITE 1100 | DALLAS, TEXAS 75219
T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
mmccrea@baronbudd.com | www.baronbudd.com

From: Sales, James [mailto:sales.james@epa.gov]
Sent: Tuesday, May 19, 2015 11:26 AM
To: Mitchell McCrea
Subject: RE: Pollock Elem., LA

Hello—Could you call when you have a chance?

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Monday, May 18, 2015 5:13 PM
To: Sales, James
Subject: PCB: Pollock Elem., LA

Jim,

Will 1:30 pm tomorrow work for you? If so, please use the following call-in information so EH&E can join us on the call.

Have a good evening.

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
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T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
mmccrea@baronbudd.com | www.baronbudd.com

Sales, James

From: Jones, Bruced
Sent: Thursday, May 21, 2015 10:07 AM
To: Mitchell McCrea
Cc: Sales, James
Subject: RE: PCBs in Pollock Elementary School

Will do. Thanks.

Bruce Jones
US EPA Region 6
1445 Ross Ave
Dallas, TX 75202
214 665-3184

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Thursday, May 21, 2015 10:05 AM
To: Jones, Bruced
Subject: RE: PCBs in Pollock Elementary School

The school district superintendent emailed me last night and said she would take care of the letter first thing this morning, so please let me know when you receive it.

Mitchell McCrea
Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

www.baronandbudd.com

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From: Jones, Bruced [mailto:Jones.Bruced@epa.gov]
Sent: Monday, May 18, 2015 2:31 PM
To: Mitchell McCrea
Subject: RE: PCBs in Pollock Elementary School

Thank you.

Bruce Jones
US EPA Region 6
1445 Ross Ave
Dallas, TX 75202
214 665-3184

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Monday, May 18, 2015 2:25 PM

To: Jones, Bruced
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: RE: PCBs in Pollock Elementary School

Ok. I will get something from them.

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
3102 OAK LAWN AVENUE | SUITE 1100 | DALLAS, TEXAS 75219
T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
mmccrea@baronbudd.com | www.baronbudd.com

From: Jones, Bruced [<mailto:Jones.Bruced@epa.gov>]
Sent: Monday, May 18, 2015 2:23 PM
To: Mitchell McCrea
Subject: RE: PCBs in Pollock Elementary School

No, since it involves a public entity, we need something from them directing us to you.

Bruce Jones
US EPA Region 6
1445 Ross Ave
Dallas, TX 75202
214 665-3184

From: Mitchell McCrea [<mailto:mmccrea@baronbudd.com>]
Sent: Monday, May 18, 2015 2:07 PM
To: Jones, Bruced
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: RE: PCBs in Pollock Elementary School

Will a letter of representation from us suffice?

Mitchell E. McCrea | ATTORNEY | BARON & BUDD, P.C.
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T: 214.521.3605 | D: 214.523.6420 | F: 214.520.1181
mmccrea@baronbudd.com | www.baronbudd.com

From: Jones, Bruced [<mailto:Jones.Bruced@epa.gov>]
Sent: Monday, May 18, 2015 2:04 PM
To: Mitchell McCrea
Cc: Spalding, Susan; Sales, James; Fruitwala, Kishor
Subject: PCBs in Pollock Elementary School

Dear Mr McCrea, EPA will need appropriate documentation from the School District that your law firm and the remedial contractor are employed by the School District and that you both are authorized to act on their behalf and that they wish that all correspondence be sent to you directly at your law firm.

Bruce Jones
US EPA Region 6
Office of Regional Counsel
1445 Ross Ave
Dallas, TX 75202

Sales, James

From: Sales, James
Sent: Wednesday, May 27, 2015 9:05 AM
To: Spalding, Susan
Subject: RE: Hi-- do you need to talk to me about Pollock elementary today?

I'm on leave tomorrow and home Friday—then back to normal schedule next week. But I can call you now if you want.

From: Spalding, Susan
Sent: Wednesday, May 27, 2015 9:03 AM
To: Sales, James
Subject: RE: Hi-- do you need to talk to me about Pollock elementary today?

I am trying to find a time when everyone is available – Bruce is working at home, looks like you are as well. Are you in the office tomorrow? I just wanted to give everyone a rundown of what I heard from Region 1. It is probably old news to you.

Susan Spalding
Associate Director, RCRA
EPA Region 6
(214) 665-8022

From: Sales, James
Sent: Wednesday, May 27, 2015 9:00 AM
To: Spalding, Susan
Subject: Hi-- do you need to talk to me about Pollock elementary today?

James Sales
EPA Region 6 PCB Coordinator
1445 Ross Ave.
Dallas, TX 75202
(214) 665-6796

Sales, James

From: Wills, Jennifer
Sent: Thursday, May 28, 2015 8:45 AM
To: Jones, Bruce; Sales, James
Subject: Pollock

DELIBERATIVE; ATTORNEY WORK PRODUCT; ATTORNEY CLIENT PRIVILEGE

One more thought about the school: it very well may be in an EJ community if it is an economically disadvantaged area.

From EPA's EJ website: Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Sales, James

From: Jones, Bruced
Sent: Thursday, May 28, 2015 10:07 AM
To: Wills, Jennifer; Sales, James
Subject: RE: Pollock

We already checked that, it does not fit any of the EJ criteria.

Bruce Jones
US EPA Region 6
1445 Ross Ave
Dallas, TX 75202
214 665-3184

From: Wills, Jennifer
Sent: Thursday, May 28, 2015 8:45 AM
To: Jones, Bruced; Sales, James
Subject: Pollock

DELIBERATIVE; ATTORNEY WORK PRODUCT; ATTORNEY CLIENT PRIVILEGE

One more thought about the school: it very well may be in an EJ community if it is an economically disadvantaged area.

From EPA's EJ website: Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Sales, James

From: Sales, James
Sent: Monday, June 01, 2015 12:44 PM
To: Mitchell McCrea
Subject: RE: Pollock Elementary, LA

OK,, let me check with my supervisors-

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Monday, June 01, 2015 12:41 PM
To: Sales, James
Cc: Christina Cossich
Subject: PCB: Pollock Elementary, LA

Jim,

We aren't able to meet on the 9th as you requested, but we can meet the following week. What proposed dates and times will work for you all?

Mitchell McCrea
Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

www.baronandbudd.com

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Sales, James

From: Sales, James
Sent: Wednesday, June 03, 2015 8:49 AM
To: Fruitwala, Kishor
Subject: RE: Pollock school update

Yes Sir!

From: Fruitwala, Kishor
Sent: Wednesday, June 03, 2015 8:48 AM
To: Sales, James
Subject: RE: Pollock school update

Thanks Jim. If there is any change, let me know by Thursday.

Kishor

From: Sales, James
Sent: Wednesday, June 03, 2015 8:47 AM
To: Fruitwala, Kishor
Subject: RE: Pollock school update

Status as of today:

1. We are waiting for a revised remediation plan from the contractor that includes a projected complete remediation plan with proposed schedule (not just an interim measures plan).
2. They aren't able to come in to meet with us next week, so we must come up with another meeting date, probably the week of June 15th.
3. We received a letter from the Pollock School District on June 1 directing EPA to work with its contractor. A copy was given to Bruce Jones.

If anything else comes up I will add to the list.

From: Fruitwala, Kishor
Sent: Wednesday, June 03, 2015 8:19 AM
To: Sales, James
Subject: Pollock school update

Please send me the update by tomorrow. Linh, as acting for Susan, will report it to Wren on Mon morning.

Thanks

Kishor

Sales, James

From: Sales, James
Sent: Monday, June 08, 2015 12:48 PM
To: Wills, Jennifer
Subject: FW: Pollock school update

From: Sales, James
Sent: Wednesday, June 03, 2015 8:47 AM
To: Fruitwala, Kishor
Subject: RE: Pollock school update

Status as of today:

1. We are waiting for a revised remediation plan from the contractor that includes a projected complete remediation plan with proposed schedule (not just an interim measures plan).
2. They aren't able to come in to meet with us next week, so we must come up with another meeting date, probably the week of June 15th.
3. We received a letter from the Pollock School District on June 1 directing EPA to work with its contractor. A copy was given to Bruce Jones.

If anything else comes up I will add to the list.

From: Fruitwala, Kishor
Sent: Wednesday, June 03, 2015 8:19 AM
To: Sales, James
Subject: Pollock school update

Please send me the update by tomorrow. Linh, as acting for Susan, will report it to Wren on Mon morning.

Thanks

Kishor

Sales, James

From: Sales, James
Sent: Tuesday, June 09, 2015 8:56 AM
To: Mitchell McCrea
Subject: RE: Pollock Elementary, LA

Hello—When I talked to your contractor a week or so ago, I mentioned that I needed a revised application that included an executive summary as well as a complete proposal for the possible cleanup scenarios at the school which would include the interim measures and final cleanup with a proposed schedule. I just wanted to make sure that this is something that you have directed your contractor to do. If so, about when would be expect the revised application?

I will keep checking here to come up with some proposed meeting dates—thanks!

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Monday, June 08, 2015 4:34 PM
To: Sales, James
Subject: RE: Pollock Elementary, LA

Sounds good. Thanks.

Mitchell McCrea
Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

www.baronandbudd.com

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From: Sales, James [mailto:sales.james@epa.gov]
Sent: Monday, June 08, 2015 4:33 PM
To: Mitchell McCrea
Subject: RE: Pollock Elementary, LA

Hello. My Branch Chief will be back tomorrow. I will get with her then to see when would be a good time for her schedule.

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Monday, June 08, 2015 10:26 AM
To: Sales, James
Cc: Christina Cossich
Subject: RE: Pollock Elementary, LA

Jim,

Good morning. Hope you had a good weekend. Just wanted to check in to see if you had figured out an alternative meeting date for us. Please let us know what you all propose, and we will see if it works on our end.

Mitchell McCrea
Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

www.baronandbudd.com

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From: Sales, James [<mailto:sales.james@epa.gov>]
Sent: Monday, June 01, 2015 12:44 PM
To: Mitchell McCrea
Subject: RE: Pollock Elementary, LA

OK,, let me check with my supervisors-

From: Mitchell McCrea [<mailto:mmccrea@baronbudd.com>]
Sent: Monday, June 01, 2015 12:41 PM
To: Sales, James
Cc: Christina Cossich
Subject: PCB: Pollock Elementary, LA

Jim,

We aren't able to meet on the 9th as you requested, but we can meet the following week. What proposed dates and times will work for you all?

Mitchell McCrea
Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

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Sales, James

From: Mitchell McCrea <mmccrea@baronbudd.com>
Sent: Tuesday, June 09, 2015 9:06 AM
To: Sales, James
Subject: RE: Pollock Elementary, LA

EH&E has been working on the revised application since we last spoke and should have it completed by next week.

Mitchell McCrea
Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

www.baronandbudd.com

Dallas | Austin | Los Angeles | Baton Rouge | New Orleans

From: Sales, James [mailto:sales.james@epa.gov]
Sent: Tuesday, June 09, 2015 8:56 AM
To: Mitchell McCrea
Subject: RE: Pollock Elementary, LA

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I will keep checking here to come up with some proposed meeting dates—thanks!

From: Mitchell McCrea [mailto:mmccrea@baronbudd.com]
Sent: Monday, June 08, 2015 4:34 PM
To: Sales, James
Subject: RE: Pollock Elementary, LA

Sounds good. Thanks.

Mitchell McCrea
Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

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Sent: Monday, June 08, 2015 4:33 PM
To: Mitchell McCrea
Subject: RE: Pollock Elementary, LA

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Sent: Monday, June 08, 2015 10:26 AM
To: Sales, James
Cc: Christina Cossich
Subject: RE: Pollock Elementary, LA

Jim,

Good morning. Hope you had a good weekend. Just wanted to check in to see if you had figured out an alternative meeting date for us. Please let us know what you all propose, and we will see if it works on our end.

Mitchell McCrea
Attorney

214.521.3605 main
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www.baronandbudd.com

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From: Sales, James [<mailto:sales.james@epa.gov>]
Sent: Monday, June 01, 2015 12:44 PM
To: Mitchell McCrea
Subject: RE: Pollock Elementary, LA

OK,, let me check with my supervisors-

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Sent: Monday, June 01, 2015 12:41 PM
To: Sales, James
Cc: Christina Cossich
Subject: PCB: Pollock Elementary, LA

Jim,

We aren't able to meet on the 9th as you requested, but we can meet the following week. What proposed dates and times will work for you all?

Mitchell McCrea
Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

www.baronandbudd.com

Dallas | Austin | Los Angeles | Baton Rouge | New Orleans

Sales, James

From: Mitchell McCrea <mmccrea@baronbudd.com>
Sent: Monday, June 22, 2015 4:42 PM
To: Sales, James
Cc: Christina Cossich
Subject: PCBs: Pollock Elementary, LA
Attachments: Letter to EPA Region 6 revised.pdf

Jim,

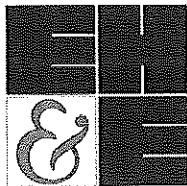
Attached is the revised application. Please let us know if it meets with your approval. Thank you.

Mitchell McCrea
Baron & Budd, PC | Attorney

214.521.3605 main
214.523.6420 direct
214.498.7508 mobile

www.baronandbudd.com

Dallas | Austin | Los Angeles | Baton Rouge | New Orleans



June 12, 2015

Mr. James S. Sales
U.S. Environmental Protection Agency
Region 6
Mail Code: 6PD
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: Pollock Elementary School, Pollock, Louisiana (EH&E 19374)

Dear Mr. Sales:

This letter is intended to provide the U.S. Environmental Protection Agency (EPA) with information regarding polychlorinated biphenyl (PCB)-contaminated building materials that exceed the allowable levels under the federal PCB regulations. These materials were identified at Pollock Elementary School located at 4001 Highway 8 in Pollock, Louisiana (the School). Environmental Health & Engineering, Inc. (EH&E) is working in conjunction with the Director of Facilities and the Superintendent of the Grant Parish School District.

As detailed below, interior and exterior caulk has been characterized and surface wipe and air samples were collected in multiple locations in the School. PCB concentrations in the caulk samples ranged from below detection to 78,800 parts per million (ppm). PCBs were not detected in any of the wipe samples collected from accessible surfaces within the School. The highest air concentrations (199 and 240 nanograms per cubic meter [ng/m^3]) were measured in an unventilated hallway area adjacent to the School's auditorium during July. The highest air concentration in a classroom was $62 \text{ ng}/\text{m}^3$ during the same time period.

On behalf of the Grant Parish School District we are requesting approval for encapsulation of identified caulk containing PCBs as an interim solution until a permanent solution can be put in place. This request for a risk based disposal approval is being made under Title 40 Code of Federal Regulations Section 761.61(c) and 761.62(c) [40 CFR 761.61(c) and 40 CFR 761.62(c)] as an interim effort to prevent dermal contact with PCB-containing caulk and to decrease airborne PCB concentrations in the School. Approximately 660 linear feet of PCB caulk is located in three entrances to the building housing the auditorium at Pollock Elementary.

It is hoped that this approval can be obtained expeditiously in order to complete the temporary mitigation work during the school summer vacation, which ends August 3, 2015. Encapsulation should require less than two to three days to complete, and the Grant Parish School District has indicated that they have funding and could initiate the work as early as June 15, 2015. Interim mitigation could be completed during Summer 2015, and a final solution involving either full removal of PCB caulk and adjacent material and/or replacement of the affected building materials within two years or by August 2017. Options to be evaluated for full removal are:

- 1) Removal of all caulking containing greater than 50 ppm PCBs, cleaning of any nonporous adjacent surfaces, and removal of a minimum of 4 inches of porous adjacent material unless testing indicates low PCBs in adjacent material; and/or
- 2) Demolition and replacement of the three entrances containing PCB caulking, if this is less costly than abatement.

SUMMARY

Concentrations of PCBs in caulk exceeding 50 ppm were identified in three entryways leading to the school auditorium. These include two side entrances to the auditorium building from outdoors as well as a glass-enclosed hallway area (“connector hallway”) that joins the auditorium building to the main school building (“Building A”) that houses ten classrooms for grades five and six. The connector hallway can be closed off from the classroom part of Building A with a sliding glass door, but it is generally left open. PCBs were not detected in caulk sampled in any other areas of the school buildings. Each unique type of caulk (based on visual inspection) in each building was sampled. No exceedances of the 50 ppm threshold were identified in classrooms, offices, or other high use areas of the School. Similarly, the highest PCB concentration in the air (240 ng/m³) was measured in the connector hallway under very low ventilation conditions.

Hallways are not air conditioned, and classroom doors are kept closed year round. Each classroom has its own heat pump system for heating and air conditioning. The auditorium is air conditioned with a separate ventilation system. One unit heater in the main hallway of the school was identified.

BUILDING INFORMATION

The existing School building was built in 1957 with an auditorium and enclosed entrances likely added at a later date. The lack of duct work in the classroom building suggests that the heat pump/air conditioning systems in the classrooms were added later as well. The entire Pollock Elementary School comprises eight separate buildings that are freestanding or connected by outdoor walkways. Building A, which houses fifth and sixth grades, is connected to an auditorium building by a glass-enclosed connector hallway area. Building A is approximately

35,000 sf with 14,000 sf occupied by the auditorium. The connector hallway is approximately 1,200 sf. Building A is brick construction with aluminum siding façade on all of the building except the auditorium, which has brick façade.

NATURE OF PCB CONTAMINATED MATERIAL

EH&E performed an investigation to identify suspect PCB-containing caulk and other sealants used throughout representative portions of the School. EH&E collected samples in a manner to investigate the installation and application of caulk, including an evaluation of evidence indicating caulk replacement or repair work.

Appendix A provides a figure illustrating the locations where bulk caulk as well as air and surface wipe samples were collected. Six unique types of caulk were identified, based on texture and color, and sampled. PCBs were detected at concentrations exceeding 50 ppm in 6 of the 17 caulk samples collected. Table 1 provides the bulk caulk sample results; the laboratory report is located in Appendix B.

Photograph 1 depicts the primary PCB caulk and the typical installation detail between the metal window frame and brick wall. Caulk with elevated concentrations of PCBs was found in a limited number of locations at metal window and door frames adjacent to brick, floor, or metal wall components. Photograph 2 depicts a typical section of the School where PCB caulk was used.

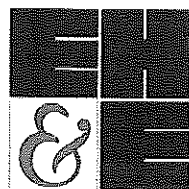


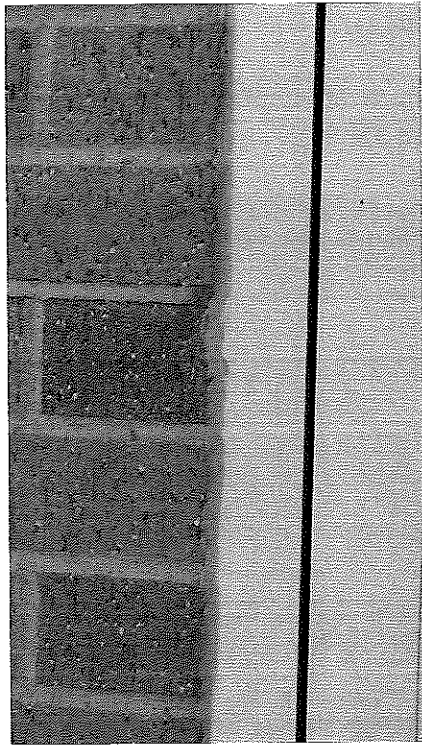
Table 1 Analytical Results for Polychlorinated Biphenyls in Bulk Caulk Samples from Pollock Elementary School, Pollock, Louisiana, July 30, 2014

Sample ID	Description	Aroclor 1254 (ppm)	Aroclor 1260 (ppm)	Total PCBs (ppm)
154923	Aluminum window and floor in glass hallway area of Building A near auditorium entrance (gray and white)	31,700	47,100	78,800
154924	Brick to floor in glass hallway area of Building A near auditorium entrance (white)	28	6	34
154925	Door frame in glass hallway area of Building A near auditorium entrance (gray and white)	25,600	38,700	64,300
154926	Door frame in glass hallway area of Building A near auditorium entrance (white, crumbly)	19	3	22
154927	Glass and frame on sliding glass door in glass hallway area of Building A near auditorium entrance (gray)	3	—	3
154928	Window frame and metal exterior in glass hallway area of Building A near auditorium entrance (above ceiling tile; gray)	22,500	27,400	49,900
154929	Window frame and metal exterior above ceiling tile in glass hallway area of Building A near auditorium entrance (gray; duplicate to 154928)	30,900	37,900	68,800
154930	Window and brick in boys bathroom in Auditorium (gray)	ND	ND	ND
154931	Exterior door frame to brick of north entrance to auditorium building (gray)	15,000	19,100	34,100
154932	Expansion joint in floor in Building A, near auditorium entrance (gray, hard)	ND	ND	ND
154933	Expansion joint in floor in Building A, North Wing (gray, hard)	ND	ND	ND
154934	Window and sill in Building B, hallway (white, soft)	ND	ND	ND
154935	Window and sill in Building B, hallway (gray, soft)	ND	ND	ND
154936	Window and sill in Room B11 of Building B (gray, hard)	ND	ND	ND
154937	Window and sill in Room B12 of Building B (white, hard)	ND	ND	ND
154938	Auditorium north entrance interior aluminum door frame and brick (gray)	24,500	28,800	53,300
154939	Main entrance window interior aluminum window frame and brick (gray, soft)	ND	ND	ND

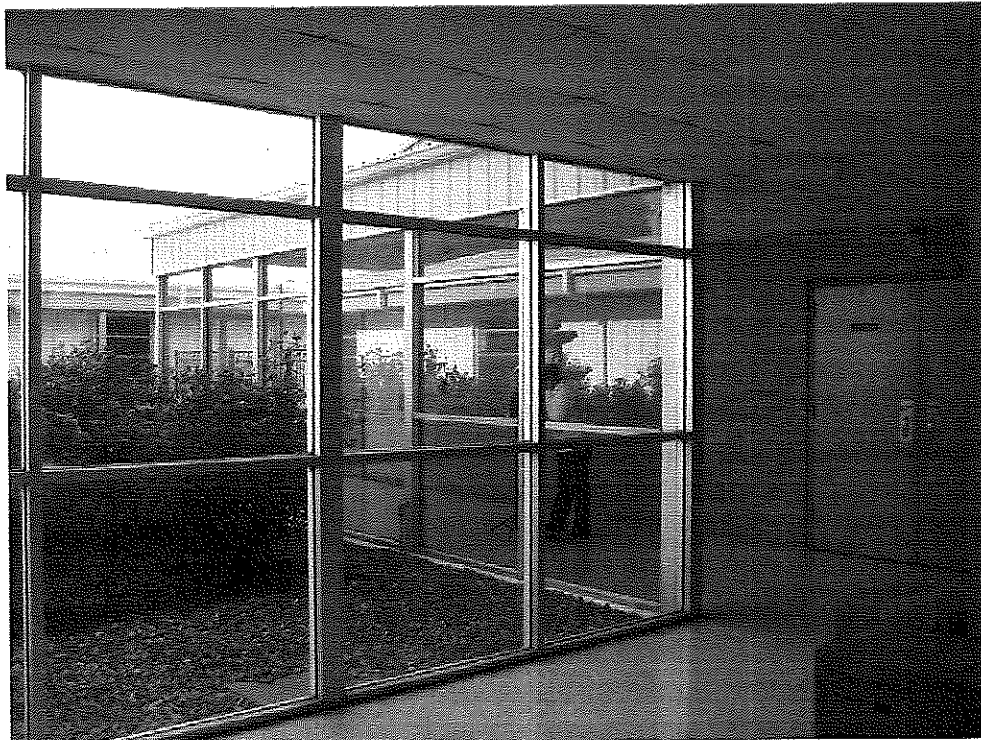
PCB polychlorinated biphenyl
ppm parts per million
ND non detect

¹ Polychlorinated biphenyl concentration analysis performed by Alpha Analytical, Inc., Westborough, Massachusetts, using U.S. Environmental Protection Agency (EPA) Method 8082 (GC/ECD).

² Aroclor 1016, 1221, 1232, 1242, 1248, 1262 and 1268 were also tested. All results below reporting levels, unless noted.



Photograph 1 Typical Caulking Detail



Photograph 2 Typical Wall Section

PROPOSED INTERIM CLEAN UP PLAN

The scope of the proposed interim clean-up plan includes approximately 660 linear feet of caulk and adjacent materials as listed in Table 2.

Table 2 Estimated Quantities of Caulk Requiring Mitigation from Pollock Elementary School, Pollock, Louisiana		
Location	Installation	Estimated Linear Feet
Connector hallway	Caulk between floor and windows	137
	Caulk around doors (outside of auditorium, facing atrium)	21
	Caulk around doors (inside auditorium)	63
	Ceiling caulk	222
Side entrance (south side) -	Interior - Caulk around windows and doors	52
	Exterior- Caulk around windows and doors	52
Side entrance (north side)-	Interior - Caulk around windows and doors	56
	Exterior- Caulk around windows and doors	56
Total		658
PCB polychlorinated biphenyl ppm parts per million ¹ Polychlorinated biphenyl concentration analysis performed by Test America, Inc., North Canton, Ohio, using U.S. Environmental Protection Agency (EPA) Method 8082 (GC/ECD).		

The Grant Parish School District is proposing the following interim mitigation activities:

- Encapsulation of approximately 660 linear feet of PCB-containing caulk with total PCB concentrations that are greater than or equal to 50 ppm.
- Polypropylene tape, such as Bond Breaker Tape manufactured by Pecora Corporation, Harleysville, Pennsylvania, or equivalent, shall be applied over the caulk, in accordance with manufacturer's instructions. The width of the tape shall be sufficient to completely cover and seal the caulk such that the silicone caulking applied over the tape will not contact the caulk. The tape shall seal in the PCBs and prevent contact with the caulk. This application must be conducted on accessible window and door caulk and immediately adjacent building materials. Safety Data Sheets for the installed products will be provided under a separate cover. EH&E has successfully implemented this strategy on an interim basis in a Massachusetts elementary school.
- Upon completion of the application of bond breaker tape, a visual inspection will be conducted under EH&E's direction to insure that application is completed as specified. EH&E or its representatives will collect confirmatory wipe samples from a representative number of locations. The exposed surface of the bond breaker tape will be sampled to verify

the completeness of the encapsulation effort. Sample results from potentially accessible surfaces must be less than 1 microgram per 100 square centimeters ($< 1 \mu\text{g}/100 \text{ cm}^2$), or the level stipulated by the EPA in its risk based approval. A minimum of 10 samples, plus additional quality control samples as specified in Appendix E, will be collected from the potentially accessible remediated surfaces.

- Encapsulated surfaces with wipe sample analytical results above the EPA approved limit will be resealed by applying an additional layer of bond breaker tape.
- Once the tape application satisfies the visual inspection and testing criteria, the Contractor shall apply a layer of silicone caulk compatible with the tape and substrate, as recommended by the manufacturer of the caulk and tape.
- During the two year time period between completion of the interim mitigation measure and final abatement of the caulk, air and wipe samples will be collected twice per year during the summer and winter seasons. Air samples will be collected at representative areas throughout the school. Wipe samples will be collected at encapsulation sites to ensure that break-through is not occurring.

Contractors must obtain proper permits and conduct work in compliance with applicable laws and regulations, including Toxic Substances Control Act (TSCA), the Resource Conservation and Recovery Act, and any other applicable federal, state, and local laws. The caulk may also contain asbestos and if so, will be handled in a manner compliant with applicable Louisiana regulations.

All solvents must be stored and used in conformance with U.S. Occupational Safety and Health Administration, EPA, and local fire department requirements and guidelines to minimize the hazard associated with the solvent. The contractor must specify work practices, procedures, and engineering controls that will be used to minimize entrainment of solvent vapors into the building and to protect workers from elevated exposures to vapors.

Soil samples from the building drip line have not been collected, and some of the PCB-containing caulking is located adjacent to grass or landscaping stones. It is recommended that soil samples be collected after the interim measures are put in place to assess any spread of PCB-containing material into soil surrounding the building's exterior.

RISK ASSESSMENT

Ecological Risk

The caulk is a non-liquid form of PCBs and will remain on the building subsequent to interim mitigation measures. The proposed encapsulation strategy will minimize exposure to potential human and ecological receptors.

Human Health Risk Assessment

Air Sampling

EH&E collected air samples for analysis of PCB homologs (modified EPA Method 8270D-SIM) on July 29, 2014. Two blanks and one duplicate were collected for quality assurance purposes. One outdoor air sample was collected for comparison purposes. The samples were collected with polyurethane foam (PUF) sampling media in borosilicate glass tubes (prepared and provided by Alpha Analytical, Mansfield, Massachusetts) using a calibrated air sampling pump (SKC Quick Take, SKC Inc., Eighty Four, Pennsylvania). At each location, air samples were collected to coincide with normal school hours (approximately 7 hours) at a flow rate of 1.0 liter per minute. All samples were sent to Alpha Analytical, Inc. for analysis.

Table 3 provides a summary of the air sampling data collected at the School. Air sampling locations are provided in Appendix C. The laboratory report is provided as Appendix D. Results of the air samples collected in the School indicate airborne concentrations do not exceed the screening level indoor air values provided by the EPA for elementary age school children (300 ng/m³). The school building is used by students in grades five and six, who are typically younger than 12 years of age. Total PCB concentrations in indoor air ranged from below detection (approximately 7.7 ng/m³) to 240 ng/m³, with the highest level measured in a hallway alcove that is not occupied on a continuous basis by staff or students. Concentrations in the classrooms ranged from below detection to 62 ng/m³.

Air samples from five classrooms were collected under normal operating conditions with the windows closed and the air-conditioning operating using existing thermostat settings. All room thermostats were set to approximately 72 degrees Fahrenheit (°F), and facilities staff stated that systems run 24-hours per day at that setting. Additional air samples were collected in a glassed-in hallway area that adjoins the auditorium to the hallways and classrooms of Building A. PCB-containing caulk is located in these hallways. This is the area that appears to have been an addition constructed after the original school, and the construction is similar to the entrances on the north and south side of the auditorium, which were also shown to have PCB-containing caulk.

Table 3 Summary of Air Sampling Results for Polychlorinated Biphenyls from the Pollock Elementary School, Pollock, Louisiana, July 29, 2014

Sample ID	Location	Parameter ¹	Results (ng/m ³)
154897	Hallway in front of auditorium	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	16.3
		Tetrachlorobiphenyls	56.2
		Pentachlorobiphenyls	71.6
		Hexachlorobiphenyls	38.2
		Heptachlorobiphenyls	16.7
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	199
154898	Hallway in front of auditorium (duplicate 154897)	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	19.1
		Tetrachlorobiphenyls	69.0
		Pentachlorobiphenyls	87.3
		Hexachlorobiphenyls	44.8
		Heptachlorobiphenyls	20.5
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	240
154899	Hallway connecting auditorium and classrooms	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	13.6
		Tetrachlorobiphenyls	33.3
		Pentachlorobiphenyls	36.7
		Hexachlorobiphenyls	21.4
		Heptachlorobiphenyls	11.7
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	117
158900	Classroom A6—middle wing	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	12.6
		Tetrachlorobiphenyls	20.9
		Pentachlorobiphenyls	11.7
		Hexachlorobiphenyls	10.8
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	56.0

Table 3 Continued			
Sample ID	Location	Parameter ¹	Results (ng/m ³)
154901	Classroom A4—front wing	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	ND
		Tetrachlorobiphenyls	11.5
		Pentachlorobiphenyls	ND
		Hexachlorobiphenyls	ND
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	11.5
154902	Classroom A9—back wing	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	14.6
		Tetrachlorobiphenyls	24.4
		Pentachlorobiphenyls	13.5
		Hexachlorobiphenyls	9.7
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	62.2
154903	Outdoor	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	ND
		Tetrachlorobiphenyls	ND
		Pentachlorobiphenyls	ND
		Hexachlorobiphenyls	ND
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	ND
154904	Classroom B3—west wing	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	ND
		Tetrachlorobiphenyls	ND
		Pentachlorobiphenyls	ND
		Hexachlorobiphenyls	ND
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	ND

Table 3 Continued

Sample ID	Location	Parameter ¹	Results (ng/m ³)
154905	Classroom B11—east wing	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	ND
		Tetrachlorobiphenyls	ND
		Pentachlorobiphenyls	ND
		Hexachlorobiphenyls	ND
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	ND
154906	Hallway adjacent to auditorium	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	13.4
		Tetrachlorobiphenyls	23.1
		Pentachlorobiphenyls	34.4
		Hexachlorobiphenyls	21.7
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	92.4
154907	Media blank	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	ND
		Tetrachlorobiphenyls	ND
		Pentachlorobiphenyls	ND
		Hexachlorobiphenyls	ND
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	ND
154908	Media blank	Monochlorobiphenyls	ND
		Dichlorobiphenyls	ND
		Trichlorobiphenyls	ND
		Tetrachlorobiphenyls	ND
		Pentachlorobiphenyls	ND
		Hexachlorobiphenyls	ND
		Heptachlorobiphenyls	ND
		Octachlorobiphenyls	ND
		Nonachlorobiphenyls	ND
		Decachlorobiphenyl	ND
		Total Homologs	ND

ng/m³ nanograms per cubic meterND non detect (10 ng/cartridge; approximate sampling volume 1.3 m³)

¹ PCB concentration analysis performed by Alpha Analytical, Mansfield, Massachusetts, using U.S. Environmental Protection Agency (EPA) Method 8270D-SIM/NOAA-M.

Surface Wipe Sampling

Surface wipe samples were also collected from 11 locations throughout the School, and were all below laboratory detection limits. Table 4 lists the locations where samples were collected.

Appendix E includes the laboratory report for surface wipe sampling. The intention of the wipe samples was to assess possible transfer of PCBs to surfaces that students and teachers may come into contact with. Additionally, three high dust loading samples (154912, 154919, and 154921) were collected from locations expected to have longer term deposition of dust. This included a sample from the top of a trophy case located in the glassed-in area outside the auditorium (the location with PCB-containing caulk).

Table 4 Surface Wipe Sample Results for Polychlorinated Biphenyls from Pollock Elementary School, Pollock, Louisiana, July 30, 2014.

Sample ID	Description	Aroclor 1254	Aroclor 1260	Total PCBs (ug/wipe)
154909	Staining on ceiling near light ballast in teacher's lounge	ND	ND	ND
154911	Window sill in front of auditorium	ND	ND	ND
154912	Top of trophy case in front of auditorium	ND	ND	ND
154913	Auditorium chair arm rest	ND	ND	ND
154914	Auditorium podium	ND	ND	ND
154915	Classroom A6, student desk	ND	ND	ND
154916	Classroom A6, student desk (replicate)	ND	ND	ND
154917	Classroom A10 computer desk	ND	ND	ND
154918	Cafeteria table top	ND	ND	ND
154919	Classroom B3 cabinet top	ND	ND	ND
154920	Building B hallway window sill	ND	ND	ND
154921	Classroom B1 top of cabinet	ND	ND	ND
154922	Field blank	ND	ND	ND
ND non detect (RL=0.5 ug/wipe)				
¹ Polychlorinated biphenyl concentration analysis performed by Alpha Analytical, Westborough, MA, using U.S. Environmental Protection Agency (EPA) Method 8082.				
² Aroclor 1016, 1221, 1232, 1242, 1248, 1262 and 1268 were also tested. All results were below reporting levels.				

Appendices A through D include site plans showing locations of air, wipe and bulk sample collection and lab reports. Appendix E includes a quality assurance/quality control plan for assessing continued performance of the mitigation.

If you have any comments or questions regarding this report, please contact either of us at 1-800-TALK EHE (1-800-825-5343).

Sincerely,



Kevin Coghlan, M.S., C.I.H.
Chief Operating Officer



David L. MacIntosh, Sc.D., C.I.H.
Chief Science Officer

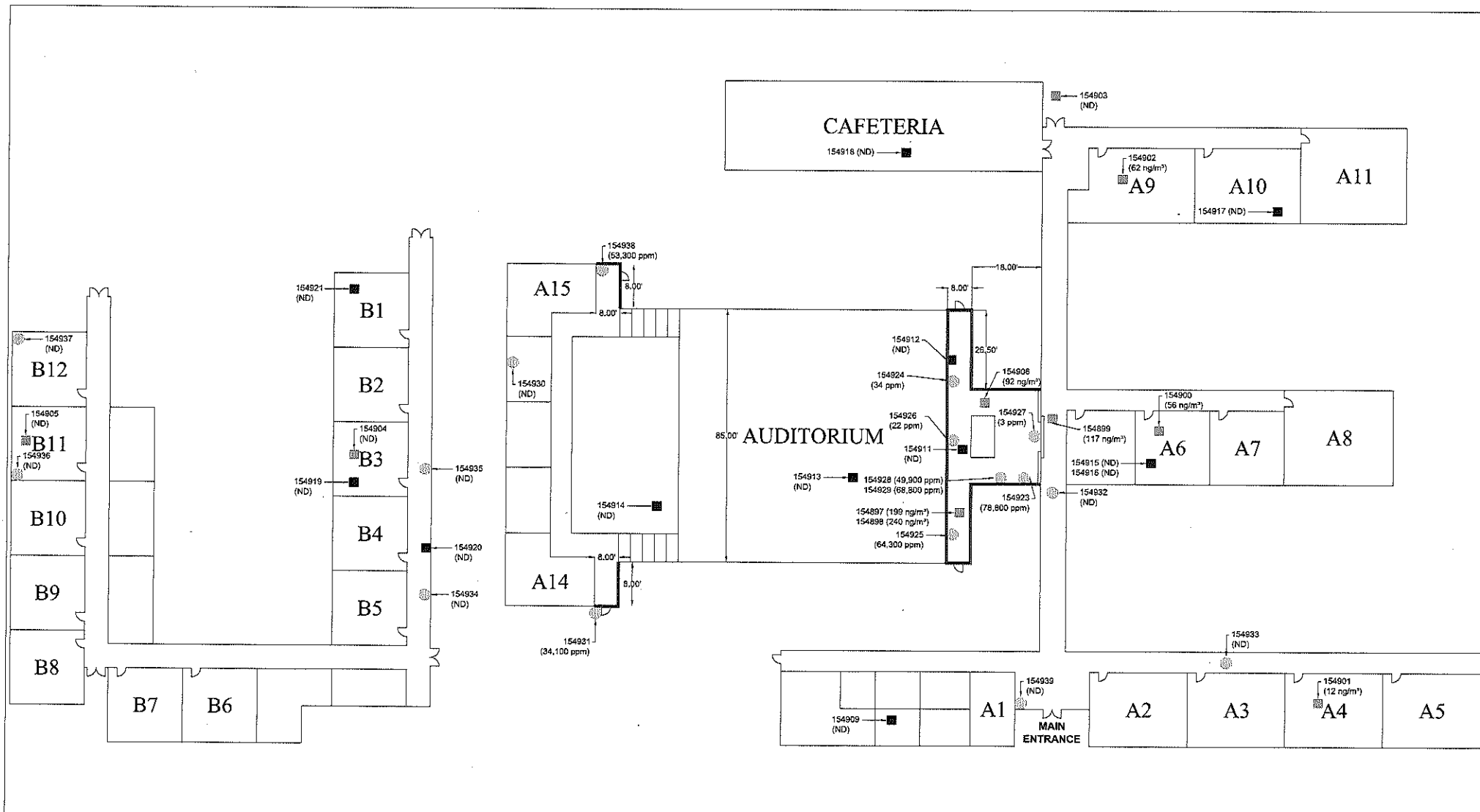


Kathleen Ward Brown, Sc.D.
Staff Scientist

Appendix A Bulk, Air, and Wipe Sampling Locations
Appendix B Bulk Sample Laboratory Report
Appendix C Air Sample Laboratory Reports
Appendix D Surface Wipe Sample Laboratory Report
Appendix E Quality Assurance/Quality Control Plan
Appendix F Limitations

P:\19374\Report\Revised Letter to EPA Region 6.docx

APPENDIX A
BULK, AIR AND WIPE SAMPLING LOCATIONS



LEGEND

- AIR SAMPLING LOCATIONS
- BULK SAMPLING LOCATIONS
- SURFACE WIPE SAMPLING LOCATIONS
- PCB-CONTAINING CAULK (≥ 50 PPM)

NOTES

- NOT TO SCALE.
- LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
- BASED ON EHE'S ASSESSMENT ON JULY 30, 2014.



TITLE:

BUILDING "A" & "B" AIR, BULK, & SURFACE WIPE SAMPLING LOCATIONS

CLIENT:

BARON & BUDD, P.C.

LOCATION:

**POLLOCK ELEMENTARY SCHOOL
4001 HIGHWAY 8
POLLOCK, LOUISIANA**

FIGURE ID:

A.1

DATE:

7/30/14

CREATED:

TQT

PROJECT:

19374

PAGE 1 OF 1



117 Fourth Avenue
Needham, MA 02454
Tel: 781-247-4300
www.eheinc.com

APPENDIX B
BULK SAMPLE LABORATORY REPORT



ANALYTICAL REPORT

Lab Number:	L1417111
Client:	Environmental Health & Engineering Inc. 117 Fourth Ave Needham, MA 02494
ATTN:	Taeko Minegishi
Phone:	(781) 247-4300
Project Name:	Not Specified
Project Number:	19374
Report Date:	08/07/14

The original project report/data package is held by Alpha Analytical. This report/data package is paginated and should be reproduced only in its entirety. Alpha Analytical holds no responsibility for results and/or data that are not consistent with the original.

Certifications & Approvals: MA (M-MA086), NY (11148), CT (PH-0574), NH (2003), NJ NELAP (MA935), RI (LAO00065), ME (MA00086), PA (68-03671), USDA (Permit #P-330-11-00240), NC (666), TX (T104704476), DOD (L2217), US Army Corps of Engineers.

Eight Walkup Drive, Westborough, MA 01581-1019
508-898-9220 (Fax) 508-898-9193 800-624-9220 - www.alphalab.com



Project Name: Not Specified
Project Number: 19374

Lab Number: L1417111
Report Date: 08/07/14

Alpha Sample ID	Client ID	Matrix	Sample Location	Collection Date/Time	Receive Date
L1417111-01	154923	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-02	154924	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-03	154925	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-04	154926	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-05	154927	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-06	154928	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-07	154929	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-08	154930	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-09	154931	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-10	154932	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-11	154933	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-12	154934	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-13	154935	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-14	154936	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-15	154937	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-16	154938	SOLID	Not Specified	07/30/14 00:00	07/31/14
L1417111-17	154939	SOLID	Not Specified	07/30/14 00:00	07/31/14

Project Name: Not Specified
Project Number: 19374

Lab Number: L1417111
Report Date: 08/07/14

Case Narrative

The samples were received in accordance with the Chain of Custody and no significant deviations were encountered during the preparation or analysis unless otherwise noted. Sample Receipt, Container Information, and the Chain of Custody are located at the back of the report.

Results contained within this report relate only to the samples submitted under this Alpha Lab Number and meet all of the requirements of NELAC, for all NELAC accredited parameters. The data presented in this report is organized by parameter (i.e. VOC, SVOC, etc.). Sample specific Quality Control data (i.e. Surrogate Spike Recovery) is reported at the end of the target analyte list for each individual sample, followed by the Laboratory Batch Quality Control at the end of each parameter. If a sample was re-analyzed or re-extracted due to a required quality control corrective action and if both sets of data are reported, the Laboratory ID of the re-analysis or re-extraction is designated with an "R" or "RE", respectively. When multiple Batch Quality Control elements are reported (e.g. more than one LCS), the associated samples for each element are noted in the grey shaded header line of each data table. Any Laboratory Batch, Sample Specific % recovery or RPD value that is outside the listed Acceptance Criteria is bolded in the report. Performance criteria for CAM and RCP methods allow for some LCS compound failures to occur and still be within method compliance. In these instances, the specific failures are not narrated but are noted in the associated QC table. This information is also incorporated in the Data Usability format for our Data Merger tool where it can be reviewed along with any associated usability implications. Soil/sediments, solids and tissues are reported on a dry weight basis unless otherwise noted. Definitions of all data qualifiers and acronyms used in this report are provided in the Glossary located at the back of the report.

In reference to questions H (CAM) or 4 (RCP) when "NO" is checked, the performance criteria for CAM and RCP methods allow for some quality control failures to occur and still be within method compliance. In these instances the specific failure is not narrated but noted in the associated QC table. The information is also incorporated in the Data Usability format of our Data Merger tool where it can be reviewed along with any associated usability implications.

Please see the associated ADEx data file for a comparison of laboratory reporting limits that were achieved with the regulatory Numerical Standards requested on the Chain of Custody.

HOLD POLICY

For samples submitted on hold, Alpha's policy is to hold samples (with the exception of Air canisters) free of charge for 21 calendar days from the date the project is completed. After 21 calendar days, we will dispose of all samples submitted including those put on hold unless you have contacted your Client Service Representative and made arrangements for Alpha to continue to hold the samples. Air canisters will be disposed after 3 business days from the date the project is completed.

Please contact Client Services at 800-624-9220 with any questions.

Project Name: Not Specified
Project Number: 19374

Lab Number: L1417111
Report Date: 08/07/14

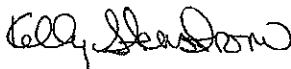
Case Narrative (continued)

PCBs

L1417111-01, -03, -06, -07, -09, and -16: The surrogate recoveries are below the acceptance criteria for 2,4,5,6-tetrachloro-m-xylene and decachlorobiphenyl (all 0%) due to the dilutions required to quantitate the samples. Re-extraction was not required; therefore, the results of the original analyses are reported.

I, the undersigned, attest under the pains and penalties of perjury that, to the best of my knowledge and belief and based upon my personal inquiry of those responsible for providing the information contained in this analytical report, such information is accurate and complete. This certificate of analysis is not complete unless this page accompanies any and all pages of this report.

Authorized Signature:



Kelly Stenstrom

Title: Technical Director/Representative

Date: 08/07/14

ORGANICS

PCBS

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-01 D
 Client ID: 154923
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/05/14 07:34
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3580A
 Extraction Date: 08/01/14 08:24
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/02/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/02/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	4460000	--	1000	A
Aroclor 1221	ND		ug/kg	4460000	--	1000	A
Aroclor 1232	ND		ug/kg	4460000	--	1000	A
Aroclor 1242	ND		ug/kg	4460000	--	1000	A
Aroclor 1248	ND		ug/kg	4460000	--	1000	A
Aroclor 1254	31700000		ug/kg	4460000	--	1000	B
Aroclor 1260	47100000		ug/kg	4460000	--	1000	B
Aroclor 1262	ND		ug/kg	4460000	--	1000	A
Aroclor 1268	ND		ug/kg	4460000	--	1000	A
PCBs, Total	78800000		ug/kg	4460000	--	1000	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	A
Decachlorobiphenyl	0	Q	30-150	A
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	B
Decachlorobiphenyl	0	Q	30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-02 D
 Client ID: 154924
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 12:53
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	4330	--	2	A
Aroclor 1221	ND		ug/kg	4330	--	2	A
Aroclor 1232	ND		ug/kg	4330	--	2	A
Aroclor 1242	ND		ug/kg	4330	--	2	B
Aroclor 1248	ND		ug/kg	4330	--	2	A
Aroclor 1254	27900		ug/kg	4330	--	2	B
Aroclor 1260	6080		ug/kg	4330	--	2	B
Aroclor 1262	ND		ug/kg	4330	--	2	A
Aroclor 1268	ND		ug/kg	4330	--	2	A
PCBs, Total	34000		ug/kg	4330	--	2	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	93		30-150	A
Decachlorobiphenyl	88		30-150	A
2,4,5,6-Tetrachloro-m-xylene	90		30-150	B
Decachlorobiphenyl	87		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-03 D
 Client ID: 154925
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/05/14 07:48
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3580A
 Extraction Date: 08/01/14 08:24
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/02/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/02/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	4130000	--	1000	A
Aroclor 1221	ND		ug/kg	4130000	--	1000	A
Aroclor 1232	ND		ug/kg	4130000	--	1000	A
Aroclor 1242	ND		ug/kg	4130000	--	1000	A
Aroclor 1248	ND		ug/kg	4130000	--	1000	A
Aroclor 1254	25600000		ug/kg	4130000	--	1000	B
Aroclor 1260	38700000		ug/kg	4130000	--	1000	B
Aroclor 1262	ND		ug/kg	4130000	--	1000	A
Aroclor 1268	ND		ug/kg	4130000	--	1000	A
PCBs, Total	64300000		ug/kg	4130000	--	1000	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	A
Decachlorobiphenyl	0	Q	30-150	A
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	B
Decachlorobiphenyl	0	Q	30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-04
 Client ID: 154926
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 04:44
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	2190	--	1	A
Aroclor 1221	ND		ug/kg	2190	--	1	A
Aroclor 1232	ND		ug/kg	2190	--	1	A
Aroclor 1242	ND		ug/kg	2190	--	1	B
Aroclor 1248	ND		ug/kg	2190	--	1	A
Aroclor 1254	18800		ug/kg	2190	--	1	A
Aroclor 1260	3470		ug/kg	2190	--	1	A
Aroclor 1262	ND		ug/kg	2190	--	1	A
Aroclor 1268	ND		ug/kg	2190	--	1	A
PCBs, Total	22300		ug/kg	2190	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	86		30-150	A
Decachlorobiphenyl	78		30-150	A
2,4,5,6-Tetrachloro-m-xylene	82		30-150	B
Decachlorobiphenyl	79		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-05
 Client ID: 154927
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 04:58
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	2290	--	1	A
Aroclor 1221	ND		ug/kg	2290	--	1	A
Aroclor 1232	ND		ug/kg	2290	--	1	A
Aroclor 1242	ND		ug/kg	2290	--	1	B
Aroclor 1248	ND		ug/kg	2290	--	1	A
Aroclor 1254	2980		ug/kg	2290	--	1	B
Aroclor 1260	ND		ug/kg	2290	--	1	A
Aroclor 1262	ND		ug/kg	2290	--	1	A
Aroclor 1268	ND		ug/kg	2290	--	1	A
PCBs, Total	2980		ug/kg	2290	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	52		30-150	A
Decachlorobiphenyl	46		30-150	A
2,4,5,6-Tetrachloro-m-xylene	50		30-150	B
Decachlorobiphenyl	49		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-06 D
 Client ID: 154928
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/05/14 08:01
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3580A
 Extraction Date: 08/01/14 08:24
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/02/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/02/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	1700000	--	500	A
Aroclor 1221	ND		ug/kg	1700000	--	500	A
Aroclor 1232	ND		ug/kg	1700000	--	500	A
Aroclor 1242	ND		ug/kg	1700000	--	500	A
Aroclor 1248	ND		ug/kg	1700000	--	500	A
Aroclor 1254	22500000		ug/kg	1700000	--	500	B
Aroclor 1260	27400000		ug/kg	1700000	--	500	B
Aroclor 1262	ND		ug/kg	1700000	--	500	A
Aroclor 1268	ND		ug/kg	1700000	--	500	A
PCBs, Total	49900000		ug/kg	1700000	--	500	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	A
Decachlorobiphenyl	0	Q	30-150	A
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	B
Decachlorobiphenyl	0	Q	30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-07 D
 Client ID: 154929
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/05/14 08:14
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3580A
 Extraction Date: 08/01/14 08:24
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/02/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/02/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	4500000	--	1000	A
Aroclor 1221	ND		ug/kg	4500000	--	1000	A
Aroclor 1232	ND		ug/kg	4500000	--	1000	A
Aroclor 1242	ND		ug/kg	4500000	--	1000	A
Aroclor 1248	ND		ug/kg	4500000	--	1000	A
Aroclor 1254	30900000		ug/kg	4500000	--	1000	B
Aroclor 1260	37900000		ug/kg	4500000	--	1000	B
Aroclor 1262	ND		ug/kg	4500000	--	1000	A
Aroclor 1268	ND		ug/kg	4500000	--	1000	A
PCBs, Total	68800000		ug/kg	4500000	--	1000	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	A
Decachlorobiphenyl	0	Q	30-150	A
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	B
Decachlorobiphenyl	0	Q	30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-08
 Client ID: 154930
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 05:12
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	6410	--	1	A
Aroclor 1221	ND		ug/kg	6410	--	1	A
Aroclor 1232	ND		ug/kg	6410	--	1	A
Aroclor 1242	ND		ug/kg	6410	--	1	A
Aroclor 1248	ND		ug/kg	6410	--	1	A
Aroclor 1254	ND		ug/kg	6410	--	1	B
Aroclor 1260	ND		ug/kg	6410	--	1	A
Aroclor 1262	ND		ug/kg	6410	--	1	A
Aroclor 1268	ND		ug/kg	6410	--	1	A
PCBs, Total	ND		ug/kg	6410	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	92		30-150	A
Decachlorobiphenyl	84		30-150	A
2,4,5,6-Tetrachloro-m-xylene	88		30-150	B
Decachlorobiphenyl	85		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-09 D
 Client ID: 154931
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/05/14 08:28
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3580A
 Extraction Date: 08/01/14 08:24
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/02/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/02/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	1970000	--	500	A
Aroclor 1221	ND		ug/kg	1970000	--	500	A
Aroclor 1232	ND		ug/kg	1970000	--	500	A
Aroclor 1242	ND		ug/kg	1970000	--	500	A
Aroclor 1248	ND		ug/kg	1970000	--	500	A
Aroclor 1254	15000000		ug/kg	1970000	--	500	B
Aroclor 1260	19100000		ug/kg	1970000	--	500	B
Aroclor 1262	ND		ug/kg	1970000	--	500	A
Aroclor 1268	ND		ug/kg	1970000	--	500	A
PCBs, Total	34100000		ug/kg	1970000	--	500	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	A
Decachlorobiphenyl	0	Q	30-150	A
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	B
Decachlorobiphenyl	0	Q	30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-10
 Client ID: 154932
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 05:25
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	2450	--	1	A
Aroclor 1221	ND		ug/kg	2450	--	1	A
Aroclor 1232	ND		ug/kg	2450	--	1	A
Aroclor 1242	ND		ug/kg	2450	--	1	A
Aroclor 1248	ND		ug/kg	2450	--	1	A
Aroclor 1254	ND		ug/kg	2450	--	1	A
Aroclor 1260	ND		ug/kg	2450	--	1	A
Aroclor 1262	ND		ug/kg	2450	--	1	A
Aroclor 1268	ND		ug/kg	2450	--	1	A
PCBs, Total	ND		ug/kg	2450	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	86		30-150	A
Decachlorobiphenyl	84		30-150	A
2,4,5,6-Tetrachloro-m-xylene	82		30-150	B
Decachlorobiphenyl	81		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-11
 Client ID: 154933
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 05:39
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	1890	--	1	A
Aroclor 1221	ND		ug/kg	1890	--	1	A
Aroclor 1232	ND		ug/kg	1890	--	1	A
Aroclor 1242	ND		ug/kg	1890	--	1	A
Aroclor 1248	ND		ug/kg	1890	--	1	A
Aroclor 1254	ND		ug/kg	1890	--	1	A
Aroclor 1260	ND		ug/kg	1890	--	1	A
Aroclor 1262	ND		ug/kg	1890	--	1	A
Aroclor 1268	ND		ug/kg	1890	--	1	A
PCBs, Total	ND		ug/kg	1890	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	85		30-150	A
Decachlorobiphenyl	82		30-150	A
2,4,5,6-Tetrachloro-m-xylene	83		30-150	B
Decachlorobiphenyl	82		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-12
 Client ID: 154934
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 05:53
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	2380	--	1	A
Aroclor 1221	ND		ug/kg	2380	--	1	A
Aroclor 1232	ND		ug/kg	2380	--	1	A
Aroclor 1242	ND		ug/kg	2380	--	1	A
Aroclor 1248	ND		ug/kg	2380	--	1	A
Aroclor 1254	ND		ug/kg	2380	--	1	A
Aroclor 1260	ND		ug/kg	2380	--	1	A
Aroclor 1262	ND		ug/kg	2380	--	1	A
Aroclor 1268	ND		ug/kg	2380	--	1	A
PCBs, Total	ND		ug/kg	2380	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	87		30-150	A
Decachlorobiphenyl	64		30-150	A
2,4,5,6-Tetrachloro-m-xylene	83		30-150	B
Decachlorobiphenyl	76		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-13
 Client ID: 154935
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 06:07
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	2180	--	1	A
Aroclor 1221	ND		ug/kg	2180	--	1	A
Aroclor 1232	ND		ug/kg	2180	--	1	A
Aroclor 1242	ND		ug/kg	2180	--	1	A
Aroclor 1248	ND		ug/kg	2180	--	1	A
Aroclor 1254	ND		ug/kg	2180	--	1	A
Aroclor 1260	ND		ug/kg	2180	--	1	A
Aroclor 1262	ND		ug/kg	2180	--	1	A
Aroclor 1268	ND		ug/kg	2180	--	1	A
PCBs, Total	ND		ug/kg	2180	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	62		30-150	A
Decachlorobiphenyl	58		30-150	A
2,4,5,6-Tetrachloro-m-xylene	62		30-150	B
Decachlorobiphenyl	61		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-14
 Client ID: 154936
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 06:20
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	2450	--	1	A
Aroclor 1221	ND		ug/kg	2450	--	1	A
Aroclor 1232	ND		ug/kg	2450	--	1	A
Aroclor 1242	ND		ug/kg	2450	--	1	A
Aroclor 1248	ND		ug/kg	2450	--	1	A
Aroclor 1254	ND		ug/kg	2450	--	1	A
Aroclor 1260	ND		ug/kg	2450	--	1	A
Aroclor 1262	ND		ug/kg	2450	--	1	A
Aroclor 1268	ND		ug/kg	2450	--	1	A
PCBs, Total	ND		ug/kg	2450	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	81		30-150	A
Decachlorobiphenyl	77		30-150	A
2,4,5,6-Tetrachloro-m-xylene	76		30-150	B
Decachlorobiphenyl	75		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-15
 Client ID: 154937
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 06:34
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	2140	--	1	A
Aroclor 1221	ND		ug/kg	2140	--	1	A
Aroclor 1232	ND		ug/kg	2140	--	1	A
Aroclor 1242	ND		ug/kg	2140	--	1	A
Aroclor 1248	ND		ug/kg	2140	--	1	A
Aroclor 1254	ND		ug/kg	2140	--	1	A
Aroclor 1260	ND		ug/kg	2140	--	1	A
Aroclor 1262	ND		ug/kg	2140	--	1	A
Aroclor 1268	ND		ug/kg	2140	--	1	A
PCBs, Total	ND		ug/kg	2140	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	88		30-150	A
Decachlorobiphenyl	87		30-150	A
2,4,5,6-Tetrachloro-m-xylene	84		30-150	B
Decachlorobiphenyl	85		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-16 D
 Client ID: 154938
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/05/14 08:41
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3580A
 Extraction Date: 08/01/14 08:24
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/02/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/02/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	1880000	--	500	A
Aroclor 1221	ND		ug/kg	1880000	--	500	A
Aroclor 1232	ND		ug/kg	1880000	--	500	A
Aroclor 1242	ND		ug/kg	1880000	--	500	A
Aroclor 1248	ND		ug/kg	1880000	--	500	A
Aroclor 1254	24500000		ug/kg	1880000	--	500	B
Aroclor 1260	28800000		ug/kg	1880000	--	500	B
Aroclor 1262	ND		ug/kg	1880000	--	500	A
Aroclor 1268	ND		ug/kg	1880000	--	500	A
PCBs, Total	53300000		ug/kg	1880000	--	500	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	A
Decachlorobiphenyl	0	Q	30-150	A
2,4,5,6-Tetrachloro-m-xylene	0	Q	30-150	B
Decachlorobiphenyl	0	Q	30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

SAMPLE RESULTS

Lab ID: L1417111-17
 Client ID: 154939
 Sample Location: Not Specified
 Matrix: Solid
 Analytical Method: 1,8082A
 Analytical Date: 08/07/14 06:47
 Analyst: TQ
 Percent Solids: Results reported on an 'AS RECEIVED' basis.

Date Collected: 07/30/14 00:00
 Date Received: 07/31/14
 Field Prep: Not Specified
 Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Dilution Factor	Column
PCB by GC - Westborough Lab							
Aroclor 1016	ND		ug/kg	2480	--	1	A
Aroclor 1221	ND		ug/kg	2480	--	1	A
Aroclor 1232	ND		ug/kg	2480	--	1	A
Aroclor 1242	ND		ug/kg	2480	--	1	A
Aroclor 1248	ND		ug/kg	2480	--	1	A
Aroclor 1254	ND		ug/kg	2480	--	1	A
Aroclor 1260	ND		ug/kg	2480	--	1	A
Aroclor 1262	ND		ug/kg	2480	--	1	A
Aroclor 1268	ND		ug/kg	2480	--	1	A
PCBs, Total	ND		ug/kg	2480	--	1	A

Surrogate	% Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	35		30-150	A
Decachlorobiphenyl	29	Q	30-150	A
2,4,5,6-Tetrachloro-m-xylene	35		30-150	B
Decachlorobiphenyl	34		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

Method Blank Analysis Batch Quality Control

Analytical Method: 1,8082A
 Analytical Date: 08/04/14 01:56
 Analyst: TQ

Extraction Method: EPA 3580A
 Extraction Date: 08/01/14 08:24

Cleanup Method: EPA 3665A
 Cleanup Date: 08/02/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/02/14

Parameter	Result	Qualifier	Units	RL	MDL	Column
PCB by GC - Westborough Lab for sample(s): 01,03,06-07,09,16 Batch: WG710506-1						
Aroclor 1016	ND		ug/kg	2580	--	A
Aroclor 1221	ND		ug/kg	2580	--	A
Aroclor 1232	ND		ug/kg	2580	--	A
Aroclor 1242	ND		ug/kg	2580	--	A
Aroclor 1248	ND		ug/kg	2580	--	A
Aroclor 1254	ND		ug/kg	2580	--	A
Aroclor 1260	ND		ug/kg	2580	--	A
Aroclor 1262	ND		ug/kg	2580	--	A
Aroclor 1268	ND		ug/kg	2580	--	A
PCBs, Total	ND		ug/kg	2580	--	A

Surrogate	%Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	123		30-150	A
Decachlorobiphenyl	135		30-150	A
2,4,5,6-Tetrachloro-m-xylene	112		30-150	B
Decachlorobiphenyl	129		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

Method Blank Analysis Batch Quality Control

Analytical Method: 1,8082A
 Analytical Date: 08/07/14 07:01
 Analyst: TQ

Extraction Method: EPA 3540C
 Extraction Date: 08/05/14 14:26
 Cleanup Method: EPA 3630
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3665A
 Cleanup Date: 08/06/14
 Cleanup Method: EPA 3660B
 Cleanup Date: 08/06/14

Parameter	Result	Qualifier	Units	RL	MDL	Column
PCB by GC - Westborough Lab for sample(s): 02,04-05,08,10-15,17 Batch: WG711338-1						
Aroclor 1016	ND		ug/kg	2040	--	A
Aroclor 1221	ND		ug/kg	2040	--	A
Aroclor 1232	ND		ug/kg	2040	--	A
Aroclor 1242	ND		ug/kg	2040	--	A
Aroclor 1248	ND		ug/kg	2040	--	A
Aroclor 1254	ND		ug/kg	2040	--	A
Aroclor 1260	ND		ug/kg	2040	--	A
Aroclor 1262	ND		ug/kg	2040	--	A
Aroclor 1268	ND		ug/kg	2040	--	A
PCBs, Total	ND		ug/kg	2040	--	A

Surrogate	%Recovery	Qualifier	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	72		30-150	A
Decachlorobiphenyl	71		30-150	A
2,4,5,6-Tetrachloro-m-xylene	68		30-150	B
Decachlorobiphenyl	70		30-150	B

Lab Control Sample Analysis

Batch Quality Control

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits	Column
PCB by GC - Westborough Lab Associated sample(s): 01,03,06-07,09,16 Batch: WG710506-2 WG710506-3									
Aroclor 1016	105		109		40-140	4		50	A
Aroclor 1260	105		114		40-140	8		50	A

Surrogate	LCS %Recovery	Qual	LCSD %Recovery	Qual	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	121		132		30-150	A
Decachlorobiphenyl	135		149		30-150	A
2,4,5,6-Tetrachloro-m-xylene	112		122		30-150	B
Decachlorobiphenyl	126		136		30-150	B

Lab Control Sample Analysis

Batch Quality Control

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

Parameter	LCS %Recovery	Qual	LCSD %Recovery	Qual	%Recovery Limits	RPD	Qual	RPD Limits	Column
PCB by GC - Westborough Lab Associated sample(s): 02,04-05,08,10-15,17 Batch: WG711338-2 WG711338-3									
Aroclor 1016	91		87		40-140	4		50	A
Aroclor 1260	105		99		40-140	6		50	A

Surrogate	LCS %Recovery	Qual	LCSD %Recovery	Qual	Acceptance Criteria	Column
2,4,5,6-Tetrachloro-m-xylene	99		93		30-150	A
Decachlorobiphenyl	98		91		30-150	A
2,4,5,6-Tetrachloro-m-xylene	91		86		30-150	B
Decachlorobiphenyl	94		87		30-150	B

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

Sample Receipt and Container Information

Were project specific reporting limits specified?

YES

Reagent H2O Preserved Vials Frozen on: NA

Cooler Information Custody Seal**Cooler**

A Absent

Container Information

Container ID	Container Type	Cooler	pH	Temp deg C	Pres	Seal	Analysis(*)
L1417111-01A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-02A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-03A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-04A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-05A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-06A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-07A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-08A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-09A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-10A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-11A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-12A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-13A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-14A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-15A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-16A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)
L1417111-17A	Amber 120ml unpreserved	A	N/A	2.0	Y	Absent	PCB-8082-CAULK(14)

*Values in parentheses indicate holding time in days

Project Name: Not Specified
Project Number: 19374

Lab Number: L1417111
Report Date: 08/07/14

GLOSSARY

Acronyms

EDL	- Estimated Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The EDL includes any adjustments from dilutions, concentrations or moisture content, where applicable. The use of EDLs is specific to the analysis of PAHs using Solid-Phase Microextraction (SPME).
EPA	- Environmental Protection Agency.
LCS	- Laboratory Control Sample: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.
LCS D	- Laboratory Control Sample Duplicate: Refer to LCS.
LFB	- Laboratory Fortified Blank: A sample matrix, free from the analytes of interest, spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes.
MDL	- Method Detection Limit: This value represents the level to which target analyte concentrations are reported as estimated values, when those target analyte concentrations are quantified below the reporting limit (RL). The MDL includes any adjustments from dilutions, concentrations or moisture content, where applicable.
MS	- Matrix Spike Sample: A sample prepared by adding a known mass of target analyte to a specified amount of matrix sample for which an independent estimate of target analyte concentration is available.
MSD	- Matrix Spike Sample Duplicate: Refer to MS.
NA	- Not Applicable.
NC	- Not Calculated: Term is utilized when one or more of the results utilized in the calculation are non-detect at the parameter's reporting unit.
NI	- Not Ignitable.
RL	- Reporting Limit: The value at which an instrument can accurately measure an analyte at a specific concentration. The RL includes any adjustments from dilutions, concentrations or moisture content, where applicable.
RPD	- Relative Percent Difference: The results from matrix and/or matrix spike duplicates are primarily designed to assess the precision of analytical results in a given matrix and are expressed as relative percent difference (RPD). Values which are less than five times the reporting limit for any individual parameter are evaluated by utilizing the absolute difference between the values; although the RPD value will be provided in the report.
SRM	- Standard Reference Material: A reference sample of a known or certified value that is of the same or similar matrix as the associated field samples.

Footnotes

- 1 - The reference for this analyte should be considered modified since this analyte is absent from the target analyte list of the original method.

Terms

Total: With respect to Organic analyses, a 'Total' result is defined as the summation of results for individual isomers or Aroclors. If a 'Total' result is requested, the results of its individual components will also be reported. This is applicable to 'Total' results for methods 8260, 8081 and 8082.

Analytical Method: Both the document from which the method originates and the analytical reference method. (Example: EPA 8260B is shown as 1,8260B.) The codes for the reference method documents are provided in the References section of the Addendum.

Data Qualifiers

- A** - Spectra identified as "Aldol Condensation Product".
- B** - The analyte was detected above the reporting limit in the associated method blank. Flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For MCP-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank. For DOD-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte at less than ten times (10x) the concentration found in the blank AND the analyte was detected above one-half the reporting limit (or above the reporting limit for common lab contaminants) in the associated method blank. For NJ-Air-related projects, flag only applies to associated field samples that have detectable concentrations of the analyte above the reporting limit.
- C** - Co-elution: The target analyte co-elutes with a known lab standard (i.e. surrogate, internal standards, etc.) for co-extracted analyses.
- D** - Concentration of analyte was quantified from diluted analysis. Flag only applies to field samples that have detectable concentrations of the analyte.
- E** - Concentration of analyte exceeds the range of the calibration curve and/or linear range of the instrument.
- G** - The concentration may be biased high due to matrix interferences (i.e. co-elution) with non-target compound(s). The result should be considered estimated.

Report Format: Data Usability Report



Project Name: Not Specified**Lab Number:** L1417111**Project Number:** 19374**Report Date:** 08/07/14**Data Qualifiers**

- H** - The analysis of pH was performed beyond the regulatory-required holding time of 15 minutes from the time of sample collection.
- I** - The lower value for the two columns has been reported due to obvious interference.
- M** - Reporting Limit (RL) exceeds the MCP CAM Reporting Limit for this analyte.
- NJ** - Presumptive evidence of compound. This represents an estimated concentration for Tentatively Identified Compounds (TICs), where the identification is based on a mass spectral library search.
- P** - The RPD between the results for the two columns exceeds the method-specified criteria.
- Q** - The quality control sample exceeds the associated acceptance criteria. For DOD-related projects, LCS and/or Continuing Calibration Standard exceedences are also qualified on all associated sample results. Note: This flag is not applicable for matrix spike recoveries when the sample concentration is greater than 4x the spike added or for batch duplicate RPD when the sample concentrations are less than 5x the RL. (Metals only.)
- R** - Analytical results are from sample re-analysis.
- RE** - Analytical results are from sample re-extraction.
- S** - Analytical results are from modified screening analysis.
- J** - Estimated value. This represents an estimated concentration for Tentatively Identified Compounds (TICs).
- ND** - Not detected at the reporting limit (RL) for the sample.

Report Format: Data Usability Report

Project Name: Not Specified

Lab Number: L1417111

Project Number: 19374

Report Date: 08/07/14

REFERENCES

- 1 Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. EPA SW-846. Third Edition. Updates I - IV, 2007.

LIMITATION OF LIABILITIES

Alpha Analytical performs services with reasonable care and diligence normal to the analytical testing laboratory industry. In the event of an error, the sole and exclusive responsibility of Alpha Analytical shall be to re-perform the work at it's own expense. In no event shall Alpha Analytical be held liable for any incidental, consequential or special damages, including but not limited to, damages in any way connected with the use of, interpretation of, information or analysis provided by Alpha Analytical.

We strongly urge our clients to comply with EPA protocol regarding sample volume, preservation, cooling, containers, sampling procedures, holding time and splitting of samples in the field.



Certification Information

Last revised April 15, 2014

The following analytes are not included in our NELAP Scope of Accreditation:

Westborough Facility

EPA 524.2: Acetone, 2-Butanone (Methyl ethyl ketone (MEK)), Tert-butyl alcohol, 2-Hexanone, Tetrahydrofuran, 1,3,5-Trichlorobenzene, 4-Methyl-2-pentanone (MIBK), Carbon disulfide, Diethyl ether.

EPA 8260C: 1,2,4,5-Tetramethylbenzene, 4-Ethyltoluene, Iodomethane (methyl iodide), Methyl methacrylate, Azobenzene.

EPA 8330A/B: PETN, Picric Acid, Nitroglycerine, 2,6-DANT, 2,4-DANT.

EPA 8270D: 1-Methylnaphthalene, Dimethylnaphthalene, 1,4-Diphenylhydrazine.

EPA 625: 4-Chloroaniline, 4-Methylphenol.

SM4500: Soil: Total Phosphorus, TKN, NO₂, NO₃.

EPA 9071: Total Petroleum Hydrocarbons, Oil & Grease.

Mansfield Facility

EPA 8270D: Biphenyl.

EPA 2540D: TSS

EPA TO-15: Halothane, 2,4,4-Trimethyl-2-pentene, 2,4,4-Trimethyl-1-pentene, Thiophene, 2-Methylthiophene, 3-Methylthiophene, 2-Ethylthiophene, 1,2,3-Trimethylbenzene, Indan, Indene, 1,2,4,5-Tetramethylbenzene, Benzothiophene, 1-Methylnaphthalene.

The following analytes are included in our Massachusetts DEP Scope of Accreditation, Westborough Facility:

Drinking Water

EPA 200.8: Sb, As, Ba, Be, Cd, Cr, Cu, Pb, Ni, Se, Ti; **EPA 200.7:** Ba, Be, Ca, Cd, Cr, Cu, Na; **EPA 245.1:** Mercury; **EPA 300.0:** Nitrate-N, Fluoride, Sulfate; **EPA 353.2:** Nitrate-N, Nitrite-N; **SM4500NO₃-F:** Nitrate-N, Nitrite-N; **SM4500F-C, SM4500CN-CE, EPA 180.1, SM2130B, SM4500CI-D, SM2320B, SM2540C, SM4500H-B**

EPA 332: Perchlorate.

Microbiology: **SM9215B, SM9223-P/A, SM9223B-Colilert-QT, Enterolert-QT.**

Non-Potable Water

EPA 200.8: Al, Sb, As, Be, Cd, Cr, Cu, Pb, Mn, Ni, Se, Ag, Ti, Zn;

EPA 200.7: Al, Sb, As, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Mg, Mn, Mo, Ni, K, Se, Ag, Na, Sr, Ti, V, Zn;

EPA 245.1, SM4500H-B, EPA 120.1, SM2510B, SM2540C, SM2340B, SM2320B, SM4500CL-E, SM4500F-BC, SM426C, SM4500NH₃-BH, EPA 350.1: Ammonia-N, **LCHAT 10-107-06-1-B:** Ammonia-N, **SM4500NO₃-F,**

EPA 353.2: Nitrate-N, **SM4500NH₃-BC-NES, EPA 351.1, SM4500P-E, SM4500P-B, E, SM5220D, EPA 410.4,**

SM5210B, SM5310C, SM4500CL-D, EPA 1664, SM14 510AC, EPA 420.1, SM4500-CN-CE, SM2540D.

EPA 624: Volatile Halocarbons & Aromatics,

EPA 608: Chlordane, Toxaphene, Aldrin, alpha-BHC, beta-BHC, gamma-BHC, delta-BHC, Dieldrin, DDD, DDE, DDT,

Endosulfan I, Endosulfan II, Endosulfan sulfate, Endrin, Endrin Aldehyde, Heptachlor, Heptachlor Epoxide, PCBs

EPA 625: SVOC (Acid/Base/Neutral Extractables), **EPA 600/4-81-045:** PCB-Oil.

Microbiology: **SM9223B-Colilert-QT; Enterolert-QT, SM9222D-MF.**

For a complete listing of analytes and methods, please contact your Alpha Project Manager.

Environmental
Health &
Engineering, Inc.

CHAIN OF CUSTODY FORM

Serial No: 08071416:09

DATE: 7/30/14

FROM: Environmental Health and Engineering, Inc.
117 Fourth Avenue
Needham, MA 02494-2725

TO: Alpha Analytical

Please send invoices to ATTN: Accounts Payable
Please send reports to ATTN: Data Coordinator

In all correspondence regarding this matter, please refer to EH&E Project # 19374

The cost of this analysis will be covered by EH&E Purchase Order #

For EH & E Data Coordinator - URGENT DATA ☐

SAMPLE ID	SAMPLE TYPE	ANALYTICAL METHOD/NUMBER	OTHER:Time/Date/Vol.
154923	BULK	EPA 8082 PCB soxhlet	7/30/14
154924		extraction	
154925			
154926			
154927			
154928			
154929			
154930			
154931			
154932			
154933			
154934			
154935			
154936			
154937			
154938			

Special Instructions:

☒ Standard turn around time

☐ Rush by date/time

☐ Other

☐ Fax results 781-247-4305

☐ RETURN SAMPLES

☒ Electronic transfer - datacoordinator@ehelinc.com

☒ Additional report recipient tminegishi@ehelinc.com

Each signatory please return one copy of this form to the above address

Relinquished by: [Signature] of Environmental Health & Engineering, Inc.

Date: 7/30/14

Received by: Kim [Signature] - Alpha of (company name) Alpha

Date: 7/31/14 922

Relinquished by: of (company name)

Date:

Received by: of (company name)

Date:

Relinquished by: of (company name)

Date:

Received by: of (company name)

Date:

Lab Data

Received by: of Environmental Health & Engineering, Inc.

Date:

Page 1 of 2

Environmental
Health &
Engineering, Inc.

CHAIN OF CUSTODY FORM

Serial Number 08071416:09

DATE: 7/30/14

FROM: Environmental Health and Engineering, Inc.
117 Fourth Avenue
Needham, MA 02494-2725

TO: Alpha Analytical

Please send invoices to ATTN: Accounts Payable
Please send reports to ATTN: Data Coordinator

In all correspondence regarding this matter, please refer to EH&E Project # 19374

The cost of this analysis will be covered by EH&E Purchase Order # _____

For EH & E Data Coordinator - URGENT DATA ☐

SAMPLE ID	SAMPLE TYPE	ANALYTICAL METHOD/NUMBER	OTHER:Time/Date/Vol.
154939	BULK	EPA 8082 PCB soxhlet extraction	7/30/14

Special Instructions:

☒ Standard turn around time

☐ Rush by _____ date/time

☐ Other _____

☐ Fax results 781-247-4305

☐ RETURN SAMPLES

☒ Electronic transfer - datacoordinator@ehinc.com

☒ Additional report recipient

tminegishi@ehinc.com

Each signatory please return one copy of this form to the above address

Relinquished by: [Signature] of Environmental Health & Engineering, Inc.

Date: 7/30/14

Received by: [Signature] of (company name) Alpha

Date: 7/31/14 922

Relinquished by: _____ of (company name) _____

Date: _____

Received by: _____ of (company name) _____

Date: _____

Relinquished by: _____ of (company name) _____

Date: _____

Received by: _____ of (company name) _____

Date: _____

Lab Data

Received by: _____ of Environmental Health & Engineering, Inc.

Date: _____

Page 2 of 2